

| | |
|--------------------|---|
| Job Name | Bacton Estate, Camden |
| Job No. | 26572 |
| Note No. | 001 |
| Date | 8 th February 2013 |
| Subject | Response to LBC Comments on Transport Assessment |
| Prepared by | Laura Harney |

Peter Brett Associates LLP
16 Brewhouse Yard, Clerkenwell,
London, EC1V 4LJ
T: +44 (0)20 7025 7100
E: london@peterbrett.com

1 Introduction

1.1 A Transport Assessment (TA) was prepared for the Bacton Estate, Camden and submitted as part of the planning application. Prior to undertaking the assessment, a scoping note was provided to LBC's Transport Department and the approach and methodology was agreed with the LBC's Transport Officer assigned to the case at the time.

1.2 This note is in response to the Transport Observations received from LBC's Transport Officer on 31st January 2013. It should be noted that since submitting the planning application for the Bacton Estate development the Transport Officer assigned to this case has changed and that a number of the items Peter Brett Associates (PBA) previously agreed with LBC's Department are now being revisited.

1.3 Following drawings and email communications are appended to this note:

- Appendix A- LBC Transport Observations;
- Appendix B- Proposed parking and existing available parking in garages;
- Appendix C- TfL Commens on Bacton Estate TA; and
- Appendix D- Revised Servicing Arrangements.

1.4 The format of this note follows the order of the Transport Observations which can be found in Appendix A.

2 Car Parking - Existing

2.1 There are currently 16 on-street parking permits held by residents of Bacton Low Rise. These permits are valid for parking in residents permit holder bays on-street as confirmed in the email from Shabnum Din, the Customer Support Team Leader in LBC, on the 4th of February 2013.

2.2 A plan showing the location of the existing parking bays on the estate was sought from LBC's Estate Parking Manager when preparing the TA, however this information was not available.

- 2.3** The proposed on-site parking provision is shown in the Parking Allocation Plan contained in Appendix B of this note. A plan showing the available garages in the residential blocks surrounding the developments is also contained in this Appendix.
- 2.4** It is proposed that vacant garages in Weedington residential blocks (as can be seen in Appendix B) will be allocated to the new development which equates to a provision of 39 garages. The remaining 18 garages will be allocated within the other residential blocks should they be required once existing development has been decanted.
- 2.5** The table below provides a summary of the existing parking spaces, including garages, within the estate and how they are currently allocated. It also summarises the number of garages required by estate residents in the future.

Table 1 Existing and Proposed Parking

| Existing Situation | | | |
|-----------------------------------|----------------|---------------|--------------------------------------|
| | Garages | Spaces | Total |
| Total | 83 | 29 | 112 |
| Bacton Residents | 45 | 13 | 58 |
| Non-Bacton | 12 | 5 | 17 |
| Void | 26 | 11 | 37 |
| Proposed | | | |
| Total to be reprovided as Garages | | | 58 |
| of which double leases | | | 3 |
| Therefore, total to be reprovided | | | 55 (57) ¹ |
| Garages available to reallocate | | | 39 in Weedington Road + 18 elsewhere |

Notes:

1. It has been agreed that two of the existing residents that hold two spaces will be allocated a second garage.

3 Car Parking – Proposed

- 3.1** Revised comments have been provided by LBC's Transport Department suggesting that the scheme should no longer be required to provide the minimal amount of on-site parking, compatible with the fair treatment of existing tenants that own a car. The Transport Officer has raised concerns that on-street parking capacity outside of CPZ hours may be reduced as a result of the level of on-site parking provision proposed for the development.
- 3.2** As outlined in the TA, there will be 55 garages provided for use by existing residents of Bacton Low Rise who currently lease an estate parking bay or garage within Bacton Estate.
- 3.3** Of the three tenants who currently hold a second garage on the Estate, it has now been agreed with LBC's Transport Officer that two of these tenants will be provided with a second garage in the proposed development. The third tenant has registered both garages to the

same vehicle and therefore will not be provided with a second garage. Therefore a total of 57 garages for the Bacton high rise and low rise residents only will be re-provided.

- 3.4** LBC's Housing and Social Care Department (HASC) has confirmed that the vacant garages will be refurbished prior to occupation. LBC's Transport Department has requested that the garages will be refurbished to meet Park Mark standards in order to provide a safe and secure parking facility. The garages will be upgraded to an acceptable condition for them to be used by residents of the estate and the current system which operates will be maintained.
- 3.5** Of the 17 garages and estate parking bays that are currently let to staff and residents of the wider local area (referred as non-Bacton in Table 1), it has been agreed with LBC's Transport Department and HASC that three of these are being used by DHO staff and are no longer required; one garage is being used by Camden Woodcraft Folk for storage and a suitable replacement storage area will be found by HASC; one garage is let by a local resident but no vehicle registration has been provided; and further one garage was let to a resident who also holds an on-street permit. As such the potential number of local residents who may impact on on-street parking is only 11 and these can be accommodated within the on-street spaces.
- 3.6** There are currently 16 on-street parking permits held by residents of Bacton Estate. It has been agreed with LBC's Transport Officer that all 16 on-street parking permits will be retained in order to account for the instance where one of the three leaseholders who hold on-street parking permits decide to take up residency in the proposed development. Should an on-street parking permit no longer be required by a resident of Bacton, this permit will be relinquished and will not be available to other residents. Therefore, the number of on-street permits held by residents of Bacton Estate will gradually be reduced over time.
- 3.7** There will be 15 disabled parking bays on-site which will be for the use of residents of the Wheelchair Accessible Units. It has been agreed that these bays will not be allocated to specific units prior to occupation and that they will be assigned dependent on the residents who require them regardless of tenure. This is to ensure that the use of on-site parking is maximised and that a situation does not occur where a bay is unused because the resident of the unit it has been assigned to, does not have a car.
- 3.8** Should a resident of the Wheelchair Accessible Unit who has not been assigned an on-street disabled parking bay be eligible for a Blue Badge, they will be entitled to apply for this facility as agreed with the LBC's Transport Officer. It is not anticipated that all 29 Wheelchair Accessible Units will accommodate disabled residents who require parking and the impact to the on-street parking capacity is expected to be minimal at most. The parking beat survey which was undertaken over the area within 200m of the development shows that while the parking is consistently used throughout the day, there is some space capacity which could accommodate a potential increase in Blue Badge holders. The scheme will also be creating the opportunity to increase the on-street permit parking provision on Vicar's Street with the closure of the access and egress associated with existing commercial units.
- 3.9** PBA would like to confirm the provision of electrical vehicle charge points as required by TfL. A provision of 20% active and 20% passive charge points across the overall on-site parking has been requested. This includes the 17 on-site parking bays and the garages. TfL have not requested an electrical vehicle charge point for all 17 of the proposed on-site parking

bays. Correspondence from TfL confirming this is provided in Appendix C and the development will meet the requirements as set out by TfL.

- 3.10** The motorcycle parking will remain as per the existing situation with facilities for three motorcycles to park in the northern section of Wellesley Road adjacent to the existing District Housing Office (DHO).
- 3.11** In summary, there will be no existing vehicles permanently displaced as a result of the proposed development at Bacton Estate. Although there is a possibility that some future Blue Badge holders **have** to park off site it is expected that the level of disabled parking provided on site will meet future demand and so any impact upon the surrounding residential streets would at most be minimal. Parking surveys have indicated that the surrounding roads do have scope to accommodate some increase in demand should that occur.

4 Cycle Parking

- 4.1** Visitor cycle parking is provided in the DHO site. Should further visitor cycle parking be required the scheme architect has requested that this is secured by condition if possible.
- 4.2** The precise location and details of the cycle parking can be controlled by condition.

5 Servicing

- 5.1** A draft of the revised servicing arrangement for Haverstock Road was issued to LBC's Transport Officer on the 6th February 2013 for their review and is contained in Appendix D of this note. The AutoTrack settings for both vehicles shown in the attached plan are set to limit steering to 85% and also to limit the forward turn rate to 5km/h and the reverse turn rate to 2.5km/h.
- 5.2** LBC Transport Officer has approved the service vehicle arrangement.

6 Access

- 6.1** The east/west pedestrian link through the site will be open to cyclists, as confirmed by the scheme architect.
- 6.2** Vehicles servicing the bulk storage area will be permitted to reverse into the site at the western end of the east/west link in order to access the area; however there will be no through route.

7 S106 Highways Contributions

- 7.1** The issues raised in this section regarding S106 contributions will be dealt with by EC Harris and Quod who will liaise directly with LBC.
- 7.2** A response has been provided to TfL regarding improvement works to the key route identified in the PERS audit as being unacceptable. This route consists of three links, two of

- 7.2** A response has been provided to TfL regarding improvement works to the key route identified in the PERS audit as being unacceptable. This route consists of three links, two of which received acceptable scores. The third link is Haverstock Road and this received an unacceptable score. Haverstock Road will be upgraded as part of the scheme and it is expected that once this has been completed the key route will receive an acceptable score. TfL have confirmed that they are satisfied that this addresses the identified area of concern.
- 7.3** TfL has recommended the use of Legible London signage and they believe that the Estate would benefit from these signages to assist pedestrian movements. Subsequent to their comments, further clarification was requested regarding the type and location of signage in the vicinity of Bacton Estate. The Legible London officer at Camden had requested 'liths' rather than fingerpost signs.
- 7.4** TfL have subsequently stated that since this will be a Camden Council implemented project utilising a TfL system, the decision rests with the Council to seek and negotiate on the type of infrastructure they wish to see implemented. TfL will then review the wider strategic context of legible routes from stations and bus stops in line with the London Plan.
- 7.5** LBC have conducted a site walkabout with the residents on the signage available within the area. The study concludes that there are several signs in the area providing direction towards Gospel Oak station and other destinations. Providing more signage will add to the street clutter and would serve the same purpose as the existing signage. Further the local residents had also commented on the excess of street furniture and signage present on the network. Gospel Oak station has recently provided a new map to provide information for facilities around the station. Moreover the proposed development is located in a residential area where pedestrians are familiar with their surroundings. Further it is felt that there is a need to undertake a strategic review of the signages in the area and around the Gospel oak station, rather than additional provision as part of this development. The review of signage strategy can be conditioned. Therefore it is requested that LBC Transport and TfL review their recommendations for Legible London signage as part of Bacton Estate.

8 Trip Generation

- 8.1** At the request of LBC's Transport Officer, PBA have revisited the trip generation for the residential element of the site using site selected from the TRAVL database with a PTAL of 3 or 4 and low parking provision. The selected sites and their resulting trip rates are appended to the note.
- 8.2** The trip generation for the residential land use was based on the net increase in residential units that would be provided on-site. This comprised an additional 29 units which would have access to a car and an additional 162 units which would be 'car-free'.
- 8.3** The table below shows the difference in the AM and PM peak hour trips when the TRAVL trip rates were applied. A detailed breakdown of the calculations is appended to this note.

| | AM Peak | PM Peak |
|---|------------|------------|
| Net Increase in Trips using TRICs (as outlined in TA) | 130 | 127 |
| Net Increase in Trips using TRAVL | 168 | 92 |
| Difference | +38 | -35 |

8.4 The comments from the Transport Officer also requested that Census 2011 data was examined in order to determine the mode split for the site. This information was not available at the time of preparing the TA and it was agreed with LBC's Transport Department at the time of preparing the TA that mode split from the London Travel Demand Survey (LTDS) would be appropriate for the development. However in order to provide a robust assessment and to satisfy to request of LBC's Transport Officer PBA have revisited this item and the table below shows the estimated trips generated by the site as outlined in the TA and the revised trip generation for the site using the TRAVL trip rates and the Census 2011 mode split.

| | Trips using LTDS (as outlined in TA) | | Revised Trips using Census 2011 | | Difference | |
|--------------------------------|---|------------|------------------------------------|-----------|------------|------------|
| | AM Peak | PM Peak | AM Peak | PM Peak | AM Peak | PM Peak |
| Underground | 0 | 0 | 30 | 16 | +30 | +16 |
| Train | 9 | 9 | 16 | 9 | +7 | 0 |
| Bus, Minibus or Coach | 52 | 51 | 68 | 37 | +16 | -14 |
| Taxi | 9 | 9 | 1 | 0 | -8 | -9 |
| Motorcycle, Scooter or Moped | 1 | 1 | 4 | 2 | +3 | +1 |
| Driving a Car or Van | 3 | 3 | 4 | 2 | +1 | -1 |
| Passenger in a Car or Van | 1 | 1 | 0 | 0 | -1 | -1 |
| Bicycle | 4 | 4 | 8 | 4 | +4 | 0 |
| On Foot | 51 | 49 | 37 | 20 | -14 | -29 |
| Other Method of Travel to Work | 0 | 0 | 1 | 0 | +1 | 0 |
| Total | 130 | 127 | 168 | 92 | +38 | -36 |

8.5 As can be seen above the use of the TRAVL trip rates results in an increase of approximately 38 trips in the AM peak period and a decrease of 36 trips in the PM peak period.

8.6 When determining the mode split for the site using LTDS data information available was for the Borough of Camden so in order to make it more site specific to Bacton Estate mode split allocated to the underground where redistributed to the other modes of public transport as the nearest underground station is over 962m from the site. However using the Census 2011 data, which is available for the area surrounding the development site, it shows that in fact residents do undertake trips using the underground.

8.7 Applying the Census 2011 to the peak hour trips estimated for the site using the TRAVL trip rates it can be seen that the number of car driver and car passenger trips remains low. Apart from the inclusion now of underground trips in the mode split the most significant changes are:

- An increase of 16 trips in the AM peak hour and a decrease of 14 trips in the PM peak hour for bus travel; and

- A decrease of 14 and 29 trips respectively in the AM and PM peak hours for walk trips.

8.8 The overall change in the number of trips generated by the residential element of the site is not deemed to be of a significant nature. There will be a negligible change to the number of vehicle trips and the increase to underground, bus and train trips are expected to be accommodated within the existing services.

9 Conclusion

9.1 The Transport Observations (dated 31st January) presented in the LBC note regarding existing and proposed parking, trip generation, servicing access and cycle parking, have been addressed within this note. It is requested that the wayfinding issues raised by TfL and LBC are reconsidered in light of the site walkabout conducted by LBC and the conclusions presented in Section 7.5 of this note.



Appendix A – LBC Transport Observations



Appendix B- Proposed parking and existing available parking in garages

Appendix C- TfL Comments on Bacton Estate TA



Appendix D- Revised Servicing Arrangements



Appendix A – LBC Transport Observations

To: Jonathan Markwell
Development Management

From: John Duffy

Date: 31 January 2013

Re: **Land bounded by Haverstock Road, Wellesley Road and Vicar's Road including Nos 121-211 Bacton Low Rise Estate, 113a,115 and 117 Wellesley Road and 2-16 Vicar's Road, Gospel Oak, London, NW5 4**

Redevelopment of Bacton Low Rise Estate, Gospel Oak District Housing Office and Vicar's Road workshops following the demolition of all existing buildings (99 Class C3 residential units Nos. 121-219 Bacton Low Rise; Class B1 offices at 115 Wellesley Road; Class B1 workshops at 2-16 Vicar's Road), to provide within buildings ranging from 2-8 storeys in height a total of 290 Class C3 residential units, comprising 176 market, 10 intermediate and 104 social rent units, 3 employment units (Class B1), new and altered public realm, landscaping, vehicular and pedestrian links/accesses, vehicular and cycle parking, bin storage and associated works.

Reference: 2012/6338/P

TRANSPORT OBSERVATIONS

Introduction

The proposals relate to the redevelopment of the Bacton Low Rise Estate, which is located to the southwest of Gospel Oak station. The application site has been split into 2 parts:

- the Bacton Low Rise (BLR) site, which is bordered by Bacton Tower to the north, Wellesley Road to the east and south, and Haverstock Road to the west, and
- the Gospel Oak District Housing Office (DHO) site, which is located to the northeast of the BLR site and is bordered by a railway line to the north, Vicar's Road to the east/south, and Wellesley Road to the west.

The BLR site comprises 99 residential units (121 to 219 Bacton Low Rise), whilst the DHO site comprises 2,475 sqm GIA of office space (115 Wellesley Road) and 922 sqm GIA of commercial floor space in 16 units (2-16 Vicar's Road).

It is proposed that both sites be demolished and redeveloped to provide a total of 290 residential units, comprising 114 affordable units and 176 market units, and

252 sqm of replacement B1 office space in the form of 3 small units, located in the northwest corner of the BLR site, off Haverstock Road. The whole site will be redeveloped in a phased manner, with tenants and residents decanted from one part of the estate to the other as demolition and construction progresses.

A Transport Assessment, which includes a Framework Travel Plan, and a Construction Management Plan have been submitted in support of the application.

Public Transport

The site has a PTAL score of 3, which indicates that it has a medium level of accessibility by public transport. It is worth noting that this score is based upon bus and rail services being located within 640m and 960m respectively of a site. Bus stops or stations located outside of these distances are ignored by the methodology, which can lead to an underestimation of a site's true accessibility.

The nearest station is Gospel Oak, which is located to the northeast of the site and is served by Overground services, whilst Kentish Town station is located to the east and is served by Northern line and Thameslink services.

The nearest bus stops are located on Southampton Road/Maldon Road to the west/south of the site (routes 24 and 46), whilst an additional bus service is available from Mansfield Road to the north of the site (route C11).

Car Parking - Existing

The site is located within Controlled Parking Zone CA-L, which operates between 8.30am and 6.30pm Monday to Friday. Resident parking bays are located around the periphery of the estate on Vicar's Road and Wellesley Road, whilst Estate parking bays are located within the estate at various locations.

There are a total of 83 garages within the BLR site, of which 45 are let to tenants and 12 are let to staff and residents of surrounding areas. The remaining 26 garages are unused.

There are 29 Estate bays within the BLR site, of which 13 are let to tenants and 5 are let to staff and residents of surrounding areas. The remaining 11 bays are unused.

An unspecified number of parking spaces are located to the rear of the DHO building, whilst at least 7 spaces are located outside the front of the commercial units.

There is currently 1 disabled parking bay and 1 motorcycle bay located within the estate, these are situated outside the DHO office at the northern end of Wellesley Road.

The residents of the BLR site hold 16 on-street parking permits (presumably Resident permits), whilst no permits are held by staff of the DHO or commercial

units. Clarification is sought on the type of on-street permits actually held by residents.

There are currently no Car Club bays located within the estate. The nearest Car Club bays are located outside the estate on Courthope Road, off Mansfield Road, to the north of the site; Mansfield Road, to the immediate west of Savernake Road; and Parkhill Road, to the west of the site, north of Dunboyne Road.

It would be helpful if the applicant could provide plans showing the existing and proposed number and location of the various parking bays within and outside the estate.

Car Parking - Proposed

The existing and proposed levels of car parking are summarised in the table below:

| Type | Existing | | | | Proposed | |
|-------------------------|-----------|--------|--------|-------|-----------|--------------|
| | Residents | Others | Unused | Total | Residents | Not Provided |
| Garages | 45 | 12 | 26 | 83 | 55 | 20 |
| Estate Permits | 13 | 5 | 11 | 29 | | |
| Disabled Spaces | 1 | 0 | 0 | 1 | 15 | 14 |
| Car Club Spaces | 0 | 0 | - | 0 | 1 | - |
| Electric Vehicle Spaces | 0 | 0 | - | 0 | 1 | - |
| Resident Permits | 16 | 0 | - | 16 | 13 | - |
| DHO | 0 | ? | ? | ? | 0 | - |
| Commercial Units | 0 | 7 | ? | 7 | 0 | 0 |
| Total | 75 | 24 | 37 | 136 | 85 | 34 |

The Transport Assessment states that 162 of the residential units will be designated as car free. However, this figure does not tally with the 83 parking spaces that are to be provided. The actual number of car free units is (290 – 83 =) 207. This will be secured by Condition/Shadow Section 106 Agreement (Blue Badge holders are exempt from car free agreements, whilst the Car Club space is outside of the car free agreement and the electric vehicle space can be used by any electric vehicle for up to 3 hours). The level of car parking that is being provided is equivalent to 0.29 spaces per unit across the site.

It is proposed that 55 of the existing 58 BLR tenants who currently park within garages or Estate bays within the site will have their parking rights retained and will be able to park in unused basement garages in the Weedington Road Estate. It is understood that the 3 tenants who will not have their rights retained currently let 2 garages each, of which only 1 will be re-provided. It is unclear what will happen to these 2nd garage users and clarification is therefore sought.

It is understood that the reason why the Weedington Road Estate basement garages currently have low usage levels is because they are in poor condition and lack basic lighting and security features. It is understood that these garages are perceived as being unsafe for people to use and are the focus of anti-social behaviour. This issue must be addressed as part of this development.

It is proposed that none of the 17 garages/Estate bays which are currently let to staff and residents of surrounding areas will be re-provided elsewhere within the vicinity of the site. It is unclear what will happen to these garage/Estate bay users and clarification is therefore sought.

It is proposed that 13 of the current 16 on-street (Resident ?) permit holders will retain their permits. The applicant has stated that the 3 remaining permit holders are leaseholders who are being bought out of their leases and are permanently moving out of the estate. However, confirmation on this is awaited.

The proposals include the provision of 15 disabled parking spaces, of which 10 will be located on the north eastern side of Haverstock Road and 5 will be located to the south of Bacton Tower. These are intended to serve 15 of the 19 affordable wheelchair ready units (equivalent to a provision of 0.8 spaces per unit). The remaining 4 affordable wheelchair ready units and 10 market value wheelchair adaptable units will be able to apply to the Council for an on street Blue Badge permit if necessary. If this were to happen, it is unclear how these 14 additional vehicles would be accommodated within the surrounding streets. Clarification is therefore sought.

The proposals include the provision of a new Car Club bay, which would be located to the south of Bacton Tower, adjacent to the 5 disabled parking bays. It is understood that Zipcar are interested in operating a Car Club vehicle from this bay. This vehicle would be available to both residents of the development and the surrounding neighbourhood. The provision of the Car Club bay should be secured by condition.

An Electric Vehicle charging bay will be provided adjacent to the Car Club bay. This use of this bay will be restricted to Electric Vehicles recharging for 3 hours only at a time. Transport for London (TfL) have requested that all 17 of the proposed on-site parking bays be equipped with Electric Vehicle charging facilities and this is supported. The provision of electric charging facilities should be secured by condition.

It is considered that some motorcycle parking should be provided to serve the proposed development. This could be provided in the parking area south of Bacton Tower.

In summary, whilst the reduction in car parking and the provision of disabled spaces, Car Club and Electric Vehicle bays is welcomed, no information has been provided as to how the 34 vehicles which are to be permanently displaced from the estate will be catered for. This is a serious cause for concern as it could lead to an unwelcome increase in parking demand on the surrounding residential streets, many of which are already close to or at full capacity. Further information in this regard is therefore required before a recommendation for approval can be given.

A Condition is required in order to bring the Weedington Road Estate basement garages, which are to be used to accommodate the vehicles of residents whose parking rights are to be retained, up to the Park Mark Safer Parking standard. This is to ensure that safe and secure replacement parking facilities will be provided to serve the proposed development.

Cycle Parking

At present there are no cycle parking facilities anywhere on the BLR or DHO sites. It is assumed that residents, office and commercial workers currently store cycles within their own properties.

The proposals include the provision of a total of 437 cycle parking spaces across the entire site, with 310 spaces on the BLR site and 127 on the DHO site. This level of provision meets the latest parking standards set out in the London Plan Revised Early Minor Alterations June 2012 of:

- 1 space per 1 or 2 bedroom unit + 1 space per 40 units for visitors;
- 2 space per 3+ bedroom units + 1 space per 40 units for visitors; and
- 1 space per 150 sqm for B1 offices.

It should be noted that the cycle numbers quoted in paragraph 5.6.1 of the Design and Access Statement do not meet the standards and should be ignored. It is considered that some cycle parking should be provided for the small commercial units. It is considered that it would be helpful to provide some of the visitor cycle parking spaces on-street within the estate.

The cycle parking facilities will be provided in a range of types around the site:

- Type 1: Josta two tier cycle racks located within 6 of the housing blocks at ground floor level adjacent to the building cores;
- Type 2: Sheffield stands located in the open air at the rear of the easternmost building in the DHO site (Block C);
- Type 3: front wheel locking stands in brick enclosures within the rear patio gardens of ground floor units in the BLR site and the front gardens of units within the DHO site;

- Type 4: front wheel locking stands in timber enclosures within the central courtyard of the easternmost block of the BLR site.

The applicant should be informed that the Type 2 stands should be covered, whilst the Type 3 and 4 stands are unacceptable and should be replaced by Sheffield stands. Further guidance on cycle parking facilities is provided in Camden Planning Guidance 7: Transport.

The provision of 437 cycle parking spaces should be secured by Condition. TfL have stated that this site lies outside the current expansion plans for the Barclays Cycle Hire scheme and so no contribution is sought in this respect.

Servicing

The westernmost units in the BLR site will be serviced on street from Haverstock Road. The TA includes a swept path analysis showing a refuse vehicle attempting to turn around at the northern end of Haverstock Road. This proposed arrangement is considered unacceptable in that it requires the vehicle to utilise an area of parking in front of the Gospel Oak Nursery Centre to manoeuvre. It also requires the vehicle to perform a full wheel lock turn in order to accomplish the manoeuvre. It is therefore recommended that a proper turning head be provided on the eastern side of Haverstock Road, adjacent to the proposed parking area.

It is understood that all other residential units will be serviced on-street from Wellesley Road or Vicar's Road. In order to service the residential units on either side of the northern section of Wellesley Road it will be necessary for the refuse vehicle to reverse up the street as there is insufficient space available for a vehicle to turn around, as per the existing arrangements. This requires one of the refuse workers to act as a banksman to ensure safe manoeuvring.

Due to their size, the small commercial units at the northern end of Havistock Road will not be provided with any loading bay facilities. It is assumed that these units will be serviced on street.

It should be noted that the plan shown on page 44, Section 5.7, of the Design and Access Statement is misleading and should be ignored.

Access

No vehicular access is to be provided into either the BLR or DHO sites. The east-west pedestrian route through the BLR site will link Haverstock Road with Wellesley Road. It is unclear whether this route will be open to cyclists and confirmation is therefore sought.

The plan shown in section 5.7 of the Design and Access Statement indicates that service vehicles will use the pedestrian link to access the basement bulk storage area. However, this is misleading as vehicles will be prevented from entering this area through the use of landscaping and other measures.

S106 Highways Contributions

The applicant has offered the following highways contributions, to be secured by Condition/Shadow Section 106 Agreement:

- £13k for the installation of an Electric Vehicle charging point; and
- £75,000 for improvements to Haverstock Road.

Neither of these contributions is considered appropriate for the following reasons:

- the Electric Vehicle charging point is a development cost and is outside of the S106 mechanism;
- no information has been given as to what “improvement” works are proposed for Haverstock Road. It is considered that the likely cost of any improvement works will be significantly higher than that suggested.

A fully costed design for Haverstock Road is therefore required from the applicant before agreement can be reached on this element of the highway works.

With regard to repaving the footways around the site and the removal of all unnecessary crossovers and railings, this too falls under the remit of S106 highway works. The majority of roads around the BLR and DHO sites are public highways, not estate roads. The applicant has no power of authority over the public highway and must not undertake any highway works on the public highway.

Any works to the public highway can only be undertaken by the Engineering Service’s contractor for this area, FM Conway. The applicant is recommended to use this contractor with respect to all highway works on estate roads and footways within the site. The estate roads and footways should be designed and constructed to adoptable standards. Only our standard palette of materials will be acceptable in terms of footway and carriageway materials, both on the public highway and within the estate.

The applicant is required to provide a plan showing all proposed highway works within the public highway. A cost estimate can then be provided for inclusion with the S106 Agreement. A cost estimate can also be provided for all highway works within the estate.

The applicant has stated that they consider the provision of the east-west pedestrian link to be an on-site in-kind contribution to the improvement of the public realm. This statement is somewhat disingenuous – the east-west link is an integral part of the development’s design and is therefore a development cost outside of the S106 mechanism.

The applicant refers to the need for a Stopping Up Order in respect of an area of public highway at the junction of Wellesley Road and Vicar’s Road. No plan has

been submitted showing the area that is to be stopped up and it is unclear which area is being referred to. The applicant is required to provide a plan showing the area that is to be stopped up. The applicant is required to pay all of the Transport Strategy and Engineering Services' costs in respect of progressing the Stopping Up Order. This will be secured by means of condition/Shadow S106 Agreement.

The applicant is required to provide a plan which clearly shows the existing and proposed extent of the applicant's land ownership with respect to the adopted public highway.

The applicant has undertaken a PERS (Pedestrian Environment Review System) audit of the surrounding streets which has highlighted a number of pedestrian routes in the vicinity of the site which present a "significant cause for concern". However, the applicant has stated that as alternative routes are available they do not consider it necessary to offer to undertake any improvements. TfL have requested that improvements be made to a number of deficient routes as identified in the PERS audit. This issue therefore requires further consideration.

TfL have stated that they believe that the estate would benefit from the provision of Legible London way finding signage to assist pedestrian movements between the site and the bus stops on Malden Road. Having discussed this issue with our Legible London officer, Anthony Bailey, he has advised that it would be preferable to provide 3 mini/midi-liths at the following locations:

- on Mansfield Road, outside Gospel Oak station ;
- at the junction of Mansfield Road and Southampton Road; and
- at the junction of Southampton Road and Malden Road.

The cost of these signs has been estimated as £24,000. A contribution for this amount should be secured by condition/Shadow Section 106 Agreement.

The applicant has indicated that they believe that no further S106 contributions are necessary. This claim is strongly refuted. A development of this size is expected to make a full and reasonable contribution towards public realm improvements in the vicinity of the site just like any other development site. This matter is therefore subject to further negotiation.

Trip Generation

The proposals include the provision of 191 additional residential units and so it is thus expected that there will be an increase in trips from the site as a result of the development.

Whilst the proposals include a reduction in the amount of office and commercial floor space that is currently provided, I would not expect this to significantly affect the overall trip generation of the site.

I have some concerns with the trip rates that have been used in the Transport Assessment, which are generally unrepresentative of either the existing or proposed development.

The residential, office and industrial trip rates are based upon sites that are located outside of London. The use of such sites is not accepted and a revised assessment should be provided using only sites based in similar locations within London.

I also have concerns with the modal splits that have been used, which are based upon Borough wide values taken from the London Travel Demand Study. Data from the 2011 Census is now available from the Neighbourhood Statistics website and this should be used for predicting the likely modal split of residents and office/commercial workers. Data for the local Output Areas, rather than Ward, should be used in the assessment.

Notwithstanding the above, TfL have stated that they consider that the proposed development is unlikely to have an unacceptable impact on the capacity of the local highway, bus, rail or London Underground services.

Travel Plan

A Framework Travel Plan has been submitted with the Transport Assessment. TfL have stated that this Travel Plan fails its ATTrBuTE assessment. A full and detailed Travel Plan, including targets and measures, will need to be developed and submitted prior to the first occupation of any residential units. The Travel Plan should be secured by Condition/Shadow S106 Agreement and include a monitoring fee of £5,561.

Construction Management Plan

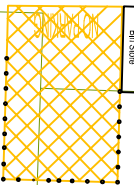
A Construction Management Plan (CMP) has been submitted in support of the application. This is a rather generic document which lacks details on how the development will be carried out. The CMP will need to be updated and submitted for review once a contractor has been appointed and prior to the commencement of any works on site. The CMP should be secured by Condition/Shadow Section 106 Agreement.

Mayoral Community Infrastructure Levy (CIL)

The proposed development will be liable for a contribution towards the provision of Crossrail under the Mayoral CIL. This is currently charged at the rate of £50/sqm GIA for all additional floor space, taking into consideration the existing floor space and uses and the affordable residential units being provided.



Appendix B- Proposed parking and existing available parking in garages



KEY:

BAYS 1 - 10 = DISABLED BAYS

BAY 11 = CAR CLUB BAY

BAYS 12 = ECYV BAY

BAY 13 -17 = DISABLED BAYS



| C | AMENDED TO ACCOMMODATE BIN STORE | LH | 08.02.13 | PDS |
|------|--|-------|----------|------|
| B | REVISED TO ACCOMMODATE SUBSTATION & TURNING HEAD | LH | 07.02.13 | PDS |
| A | FINAL ISSUE | LH | 22.11.12 | PDS |
| Mark | Revision | Drawn | Date | Chkd |

SCALING NOTE: Do not scale from this drawing. If in doubt, ask.
 UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty is made to this effect. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake his own investigation where the presence of any existing sewers, services, plant or apparatus may affect his operations.

Drawing Issue Status

FINAL

**PARKING STRATEGY
 BACTON LOW RISE REDEVELOPMENT**

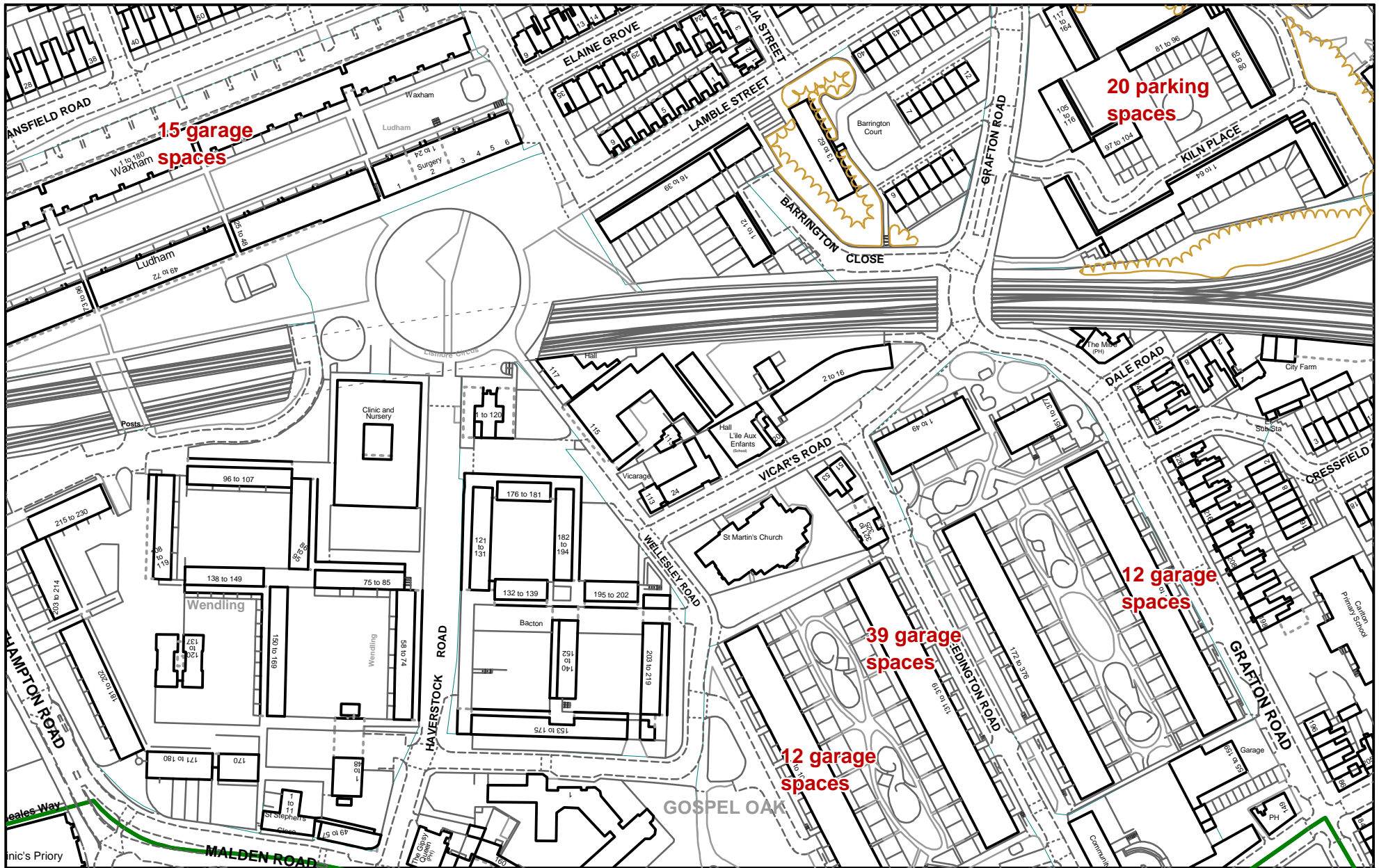
Client
**LONDON BOROUGH
 OF CAMDEN**



Offices throughout the UK,
 continental Europe, Africa and Asia
 www.peterbrett.com
 © Peter Brett Associates LLP

| | | | |
|-------------------|---------------|------------|----|
| Date of 1st Issue | 31.08.2012 | Drawn by | PH |
| A3 Scale | 1:500 | Checked by | LH |
| Drawing Number | 26572/001/003 | Revision | C |

Tel: 020 7981 9900 Fax: 020 7922 1185



Bacton alternative parking provision

Reproduced by permission of Ordnance Survey on behalf of HMSO.
 © Crown copyright and database right 2012.
 Ordnance Survey Licence number 100019726.

Scale 1: Not Usable Scale



Print Date: 30/08/2012

Printed By:

Map Ref No:

Appendix C- TfL Comments on Bacton Estate TA



Our ref: 12/2222
Your ref: 2012/6338/P

Jonathan Markwell,
Planning Development Control,
London Borough of Camden,
The Town Hall,
Argyle Street,
London,
WC1H 8ND

19th December 2012

Dear Jonathan,

Land bounded by Haverstock Road, Wellesley Road and Vicar's Road (Bacton Low Rise Estate) - TfL's initial response

I write following receipt of the above referable planning application dated November 2012. The comments reflect the previous advice provided at the GLA pre-application stage and provides updated advice in the context of the London Plan, prior to stage 1 referral to the Mayor.

Please note that these comments represent an officer level view from Transport for London and are 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. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Site Location

The site is bounded to the west by Haverstock Road, to the south and west by Wellesley Road and Vicars Road and to the north by the railway viaduct and Lismore Circus. All of these roads are borough roads, with the nearest part of the Transport for London Road Network (TLRN) being the A41 Finchley Road over 1km away. The nearest section of the Strategic Road Network (SRN) is the A400 Kentish Town Road also over 1km away, to the east of the site.

Three bus services are accessible within the maximum recommended walk distance of 400m from the site. Routes 24 and 46 operate on Malden Road and route C11 on Mansfield Road. These routes combine to provide access to destinations in central and north west London. Gospel Oak Station also lies within acceptable walking distance of the site offering London Overground services. In addition, Chalk Farm London Underground station is within the acceptable 1km walking distance of the site and provides

services on the Northern Line.

As such, the Public Transport Accessibility Level (PTAL) of the site is 3 (moderate) on a 1 to 6 scale, where 6 is very high and 1, very low. This does not however take into account Chalk Farm Underground station and as such the accessibility level may be in reality slightly greater.

Site Access

The site is accessed from Wellesley Road, Haverstock Road and Vicars Road. TfL welcomes the principle of creating a new east-west pedestrian and cycle link through the site.

TfL welcomes that the applicant has undertaken a pedestrian (or PERS) assessment of the surrounding area and the subsequent possible improvements which are proposed to link L20 to Grafton Terrace and the bus stop. As the deficiencies identified are around legibility TfL recommends Legible London infrastructure is secured at this site to complement the existing finger posts. Further discussion on this matter is requested in order to agree and develop a possible scheme, and associated cost, for Legible London at this site and to discuss mechanisms for securing and implementing this infrastructure (possibly by Unilateral Agreement).

The PERS audit demonstrates deficiencies on links 34, 12 and 16 which connect the site to St Dominic's School, Church and bus stop. No measures are however proposed for these links. As this is seen an important route, TfL requests clarification as to why improvements are not proposed to upgrade these links.

Parking

It is currently proposed that 162 of the 191 new residential units will be car free, with 15 disabled bays and 1 electric vehicle charging point. In addition, 57 garaged spaces are to be allocated in another part of the Bacton Low Rise Estate to accommodate existing residents. This represents a reduction of 57 spaces from the existing level which is supported by TfL. Clarification is however sought as to the mechanism to allocate these permits and if new residents will be excluded from applying for them. Currently there are 16 parking permits issued for residents of these blocks to park in the surrounding CPZ. It is proposed that this will be reduced to 13. It is welcomed that the commercial units will be car free. A summary of the existing and proposed level of parking is provided in the table below.

| | Existing Provision | Proposed Provision | Notes |
|-------------------|--|--------------------|--|
| Garage Permits | 83 | 55 (off site) | Catering for 99 units 0.55 spaces per unit |
| Site spaces | 29 | 17 | 15 Disabled, 1 EVCP and 1 Car Club Bay (See Below) |
| CPZ permits | 16 | 13 | Clarity sought as to how these will be allocated and capped |
| Commercial Spaces | 8 spaces for commercial units, unclear how many DHO spaces | 0 | Car free – information on the number of existing DHO spaces is requested |
| <i>Total</i> | 136 spaces | 85 spaces | Net reduction of 51 spaces |

As demonstrated above the proposed parking provision demonstrates a net reduction of 51 spaces. Applying this to the number of units proposed at the site, the parking provision equates to 0.29 spaces per residential unit which is in accordance with London Plan policy 6.13.

Notwithstanding this, in order to be fully compliant with London Plan Policy the applicant should increase the level of Electric Vehicle Charging Points, with 20% of spaces having an active charging point and 20% having passive provision. This is applicable to the 17 spaces which will be located on Haverstock Road and Wellesley Road. Further guidance around the installation of charging points on the highway is available from TfL upon request. In addition it should be clarified if charging is available within the 55 garages.

The applicant should clarify if the new occupiers of the proposed development will be prevented from applying for a parking permit in the local Controlled Parking Zones and how the 13 CPZ permits will be managed. The funding of an additional car club space on Wellesley Road and consultation with an operator is supported by TfL and should be secured through the S106 agreement for the site.

Trip Generation

Trip generation has been based on a TRICS assessment. TfL prefers the use of TRAVL given the site location and seeks clarity as to why this has not

been used to inform the trip rates. As noted above clarity is also sought on the mechanisms to prevent existing residents from applying for a new permit to park in the surrounding area. Notwithstanding this TfL accepts the methodology to calculate the existing trips and to discount these from the new trips. Given the distance from the TfL highway network the methodology presented is overall acceptable

The assessment further demonstrates that the predominant mode of travel during the AM and PM peaks will be on the bus network. TfL largely accepts this assertion given the distance of other modes of transport from the site.

Public Transport

Notwithstanding the comments on trip generation above, it is unlikely that the development will result in an unacceptable impact on the capacity of local highway, rail or London Underground services.

Whilst the development is also unlikely to impact on bus capacity in the area and as the bus network is the predominate mode of travel from the site, TfL recommends that as described above, links to local bus stops are improved. TfL encourages the borough to implement works on these networks. The quality of local bus stops has been assessed and countdown is already present at the stops on Malden Road as such no contribution is requested.

Cycling

Cycle parking is proposed in accordance with London Plan and the early alterations to the London Plan standards with 437 site spaces provided, which is supported by TfL. The five covered sheltered stores split around the ground floor of both buildings is supported by TfL.

TfL has assessed this site in the context of the Cycle Hire Scheme Expansion and Intensification Project which includes a number of criteria. In this instance the site is not within the current expansion plans for cycle hire. TfL will however continue to keep this under review.

Travel Plan

A travel plan has been provided as an appendix to the transport assessment and it should be secured, along with any necessary measures or financial contributions as part of a financial agreement (Unilateral Agreement) for the site. The travel plan has unfortunately failed its ATTrBuTE assessment; the results have been appended to this response to guide the future development of a full plan. TfL expects to see robust targets implemented through the plan with mechanisms to achieve these targets alongside a clear monitoring strategy, setting out who will be responsible for monitoring this plan.

Servicing

TfL welcomes the draft servicing management strategy submitted as part of the Transport Assessment this is considered acceptable in the context of the London Plan. It is recommended that a delivery and servicing strategy is secured as part of the travel plan.

Construction

A Construction Logistics Plan (CLP) should be secured for the site by condition. The CLP submitted as an appendix to the TA is considered acceptable and should be secured by condition.

Community Infrastructure Levy (CIL)

The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April 2012. The charging rate for Camden is £50 per sqm. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/uksi/2011/987/made>

London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Camden Council has yet to adopt a scheme.

Summary

To summarise, further information on trip generation, parking, pedestrian improvements and mechanisms to secure financial obligations is requested.

We look forward to hearing from you soon to understand how you intend to address the comments raised in this letter.

Yours sincerely

Andrew Dorrian
Planner, TfL Borough Planning
Email: AndrewDorrian@tfl.gov.uk

Copy to:
GLA PDU, Laura Harney (PBA)

Your ref:

Our ref: LH/AD/26572/LH



14 January 2013

Transport for London
Land Use Planning
Windsor House
42-50 Victoria Street
London
SW1H 0TL

Peter Brett Associates LLP
16 Brewhouse Yard,
Clerkenwell,
London, EC1 V 4LJ
T: +44 (0)207566 8600
E: london@peterbrett.com

Attn: Andrew Dorrian

Dear Andrew,

RE: Bacton Low Rise Estate, Camden – Response to TfL Comments

Thank you for your letter dated 19th December 2012 which outlines Transport for London's (TfL) initial comments on the proposed development at Bacton Estate. As requested please find below the further information regarding trip generation, parking and pedestrian improvements that you requested in your correspondence. Where the information you have requested is not yet available, I hope to get this to you at the earliest possible date.

Trip Generation

In your letter you question the use of the TRICS database when determining the expected number of trips to be generated by the development. The initial trip generation calculation for Bacton Estate was undertaken using the TRAVL database and the resulting trip rates and number of trips for each land use within the existing and proposed development was provided to London Borough of Camden's (LBC) Transport Officer in an email dated 1st October 2012 for their review.

The trip rates obtained from TRAVL were deemed to be quite low in comparison to other developments in the Borough of Camden, this was partially due to the limited number of sites available in the database which were of a similar nature to Bacton Estate. At the request of the Transport Officer we consulted the TRICS database and found that a larger selection of suitable sites was available that gave trip rates which were more in line with those expected for the area.

Parking

There are currently 16 on-street parking permits held by residents of Bacton Estate. It is proposed that 13 of these permits will be retained by tenants that take up residency in the proposed development. There will also be 55 garages, in the neighbouring residential blocks, which will be allocated to existing Bacton Estate residents who currently lease on-site garages.

In your letter, you requested further information on the mechanism to allocate the on-street permits and garages and whether new residents of the estate would be excluded from applying for either of these, should one become available. We consulted LBC's Transport Officer on this matter and were informed that the Council are currently examining this and will provide a response when a decision has been made.

J:\26572 Bacton Estate Camden\Reports\Transport\Response to TfL\130109 Response to TfL Comments - Bacton Estate.docx

Registered Office: Caversham Bridge House, Waterman Place, Reading, Berkshire, RG1 6DN, UK. T: +44 (0)118 950 0761 F: +44 (0)118 959 7498
Peter Brett Associates LLP is a limited liability partnership and is registered in England and Wales with registered number OC334398.
A list of members' names is open to inspection at our registered office. Brett Consulting Limited is wholly owned by Peter Brett Associates LLP.
Registered number: 07765026.

Roger Tym & Partners is part of Peter Brett Associates LLP.

www.peterbrett.com



The area to the east of the DHO was previously used by staff of the office to park their vehicles. However the area has been taken over by one of LBC's contractors and is now being used as a depot for storing materials and equipment. It was therefore not possible to determine the number of car parking spaces previously available to DHO staff.

There will be a dedicated electrical vehicle bay provided within the on-site parking provision. The remainder of the parking will comprise 15 disabled parking bays and one car club bay. In your letter you outline that the London Plan Policy seeks 20% of parking spaces to have an active charge point and 20% of parking spaces to have a passive charge point. This would equate to approximately seven on-site parking bays having either an active or passive charge point. The scheme would see this as a benefit to future residents of the estate and agree in principle to increasing the level of electrical vehicle charge point provision to meeting the London Plan Policy.

Electrical vehicle charging facilities are currently not available within the garages in the neighbouring blocks.

Pedestrian Improvements

The PERS audit identified the route from the development site to St. Dominic's School as being of an unacceptable standard. This route comprises three links – Haverstock Road, Wellesley Road adjacent to Bacton Low Rise and the western side of Malden Road from Quadrant Grove to St Dominic's School. Of these three links, two received amber scores, Wellesley Road and Malden Road, which were deemed acceptable but had room for some improvement. The link which received a red score which is unacceptable was Haverstock Road. This link will be upgraded as part of the scheme and pedestrian facilities here will be greatly improved as a result. This is expected to improve the score for the route and increase its overall rating to an acceptable level.

We have also taken on board your comments regarding the incorporation of Legible London infrastructure at the site to complement the existing fingerpost signage. While the PERS audit recognised that legibility in the area could be improved we are unsure if the level of signage provided by Legible London would be appropriate. Bacton Estate is located in an area which is primarily residential and the majority of pedestrians in the area live locally and would not require such detailed signage. We would be happy to discuss this further, however at this point we do not see the benefit of such a scheme in an area that does not currently attract many visitors.

I trust that the above information will assist with TfL's assessment of the development. I will update you once a decision has been made by LBC regarding the management of the on-street parking permits and garages associated with the proposed development.

Please don't hesitate to contact me should you have any further questions or comments.

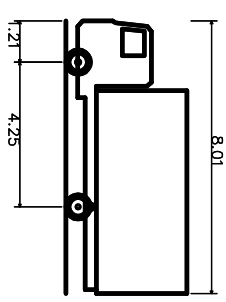
Yours sincerely

Laura Harney
For and on behalf of
PETER BRETT ASSOCIATES LLP

Cc: Julia Farr (LBC)
Jonathon Markham (LBC)
Rachael Matthiae (EC Harris)
Rachel Godfrey (Quod)
Peter DeSouza (PBA)
Robert Parker (PBA)

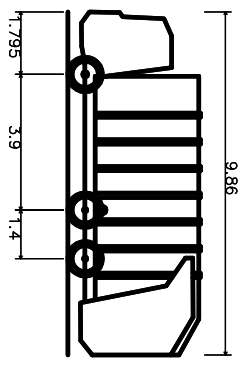


Appendix D- Revised Servicing Arrangements



7.5t Box Van

| | |
|---------------------------|--------|
| Overall Length | 8.010m |
| Overall Width | 3.556m |
| Min Body Ground Clearance | 0.361m |
| Lock to Lock | 2.064m |
| Kerb to Kerb | 4.005m |
| Turning Radius | 7.400m |



Large Refuse Vehicle (3 axle)

| | |
|---------------------------|--------|
| Overall Length | 9.860m |
| Overall Width | 2.450m |
| Min Body Ground Clearance | 3.814m |
| Track Width | 0.366m |
| Lock to Lock | 2.450m |
| Kerb to Kerb | 4.005m |
| Turning Radius | 9.500m |

| | | | | |
|------|----------------------------------|-------|----------|------|
| C | AMENDED TO ACCOMMODATE BIN STORE | LH | 08.02.13 | PDS |
| B | CHANGE TO VEHICLE TURNING AREA | LH | 06.02.13 | PDS |
| A | FINAL ISSUE | LH | 22.11.12 | PDS |
| Mark | Revision | Drawn | Date | Chkd |

FINAL

SCALING NOTE: Do not scale from this drawing. If in doubt, ask.

UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake his own investigation where the presence of any existing sewers, services, plant or apparatus may affect the operations.

Drawing Issue Status

**BACTON LOW RISE REDEVELOPMENT
SWEEP PATH ANALYSIS
LARGE REFUSE VEHICLE AND
7.5T BOX VAN**

Client
**CAMDEN BOROUGH
COUNCIL**

| | | | |
|-------------------|---------------|------------|----|
| Date of 1st Issue | 28.09.2012 | Drawn by | CM |
| A3 Scale | 1:500 | Checked by | LH |
| Drawing Number | 26572/001/004 | Revision | C |

Offices throughout the UK,
continental Europe, Africa and Asia
www.peterbrett.com
© Peter Brett Associates LLP
Tel: 020 7984 9900 Fax: 020 7922 1185