



Our ref: 14/1848  
Your ref: 2014/4381/P

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Via email only

28<sup>th</sup> July 2014

Dear Neil,

**102 Camley Street, London NW1 0PF**

I write following receipt of the above planning application.

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.

Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge the 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.

## **Development Description**

Demolition of existing warehouse building (Class B8) and redevelopment for a mixed use building ranging from 8-12 storeys comprising 1,620sqm employment floorspace (Class B1), 154 residential flats, the provision of a public ramp access to the Regents Canal towpath, and associated landscaping and other works relating to the public realm.

## **Access**

The site has a frontage onto Camley Street to the west and adjoins Network Rail and Channel Tunnel Rail Link (CTRL) rail lines to the east and 104 Camley Street to the north. Camley Street is a borough road, with the nearest part of the Transport for London Road Network (TLRN) being the A400 Camden Street approximately 450 metres to the west. Four bus services (routes 46, 214, 45 and 63) are available from bus stops to the

south at the junction of Camley Street with Goods Way. Access by rail and Underground is provided at Kings Cross St Pancras to the south of the site. However the distance to platforms as measured by the PTAL calculator indicates that only St Pancras domestic rail services fall within the 12 minute walk threshold giving a PTAL of 3. The transport consultants have estimated that recent access improvements have reduced this distance and would bring the full range of national and international rail services as well as London Underground services on the Victoria, Northern, Piccadilly, Circle, Metropolitan and Hammersmith & City lines within range. Calculated on this basis, the site records the highest Public Transport Accessibility Level (PTAL) of 6b.

### **Car Parking**

The development is intended to be car free, with the exception of two Blue Badge spaces which are located within a designated area at the north-east corner of the site. Although the provision of two spaces is below the Lifetime Homes recommended standard of 10% of all units, on-street parking in residents' bays is available to Blue Badge holders to the north of the site on Camley Street. The use of on site spaces will need to be kept under review to ensure that they are allocated to those in most need. The applicant is willing to enter into a permit free agreement which will prevent other occupiers from applying for a permit to park on street. This approach is supported in accordance with London Plan policy 6.13 *Parking*.

### **Trip Generation**

An assessment of trip generation has been carried out using the TRAVL database. Due to the car free nature of the development, the assessment indicates that the traffic impact will be less than the current use and the additional demand can be accommodated on the strategic road and public transport networks.

### **Cycle Parking**

A total of 253 secure cycle parking spaces are proposed to serve the residential development. 16 cycle parking spaces are proposed to serve the commercial development. Although this meets the adopted London Plan requirements it is lower than emerging standards in the draft Further Alterations to the London Plan (FALP) published in January 2014 which would lead to a total requirement of 309 spaces to serve the residential development (2 spaces for all units above 45 sq m. and 4 spaces for visitors) and 18 long-stay spaces to serve the B1 office development as well as 1 short-stay space for visitors. The visitor spaces should be accessible from the street frontage. TfL would encourage the applicant to consider a higher level of provision to reflect the emerging standards in FALP.

## **Walking and Cycling Infrastructure**

TfL strongly supports provision of the pedestrian bridge across the Regent's Canal as well as the principle of improved pedestrian links across Camley Street which have been put forward as part of development proposals for 103 and 101 Camley Street. A proportionate financial contribution should be made by this development towards these improvements. TfL also supports the proposed cycle ramp which will be provided as part of this development along the west of the site between Camley Street and the towpath on the Regent's Canal. It is important that the detailed design, which will be agreed through a planning condition, facilitates cycle movements without having an adverse impact on pedestrians.

The nearest cycle hire docking stations are located 700 metres walk from the site either to the west on Royal College Street or to the south on Pancras Road. There is currently a gap in the network and increased residential development will cumulatively increase demand leading to a need for an additional docking station. Although no detailed site surveys have been carried out yet, there may be potential to site a station on Camley Street to the north of the canal or possibly on Granary Street; a 25 metre uninterrupted space would ideally be needed. Further discussions and site visits to include Camden transport officers, the applicant's consultants and TfL will be arranged to identify suitable locations. The total cost of providing a docking station (excluding land) is £187,000. Contributions should be shared between this development and the adjacent site at 101, Camley Street to cover the costs of a new docking station within the area.

## **Travel Plan**

A draft travel plan has been provided as part of the application. The finalised plan will need to be secured, along with any necessary measures or financial contributions as part of the section 106 agreement for the site. TfL also recommends that a separate Delivery and Servicing Plan is produced.

## **Construction**

A Construction Management Plan will also be prepared and secured through a section 106 agreement. This should follow TfL guidance on preparing and implementing a Construction Logistics Plan (CLP). Further information is available <http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans#on-this-page-1>. The Plan should include mention of vehicle booking systems, the use of re-timed or consolidated construction vehicle trips, protection of vulnerable road users and using operators committed to best practice as demonstrated by membership of TfL's Freight Operator Recognition Scheme (FORS) or similar. Given the location of the site use of the adjacent canal for movement of construction material should be encouraged.

## **Mayoral 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 charging rate for Camden is £50 per sq m.

## **Summary**

To summarise, there is not expected to be an adverse impact on the operation of the strategic transport network as a result of the development. A section 106 agreement should be used to secure the Travel Plan, Delivery and Servicing Plan and Construction Management Plan. As well as providing the cycle ramp, a financial contribution towards a cycle hire docking station and the pedestrian improvements put forward as part of developments at 103 and 101 Camley Street should be provided. Further discussions and site visits will be needed to identify a suitable location for the docking station within the area. TfL would also encourage a higher level of cycle parking in line with emerging standards in FALP.

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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