



Our ref: 14/3367

Your ref: 2014/7649 & 2014/7651

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23rd January 2015

Dear David

## **RE: Liddell Road Industrial Estate, West Hampstead, Camden – TfL's Initial Comments**

I write following receipt of the Transport Assessment (TA) report and associated plans, submitted in joint support of the above referable planning applications received on 6<sup>th</sup> January 2014. There is one application representing each phase, i.e. reference 2014/7649 represents phase 1, the School construction and reference 2014/7651 represents phase 2, the houses and offices. My comments cover both applications.

### **Background**

A pre-application meeting was held on 18th December 2015, when we were informed that an application had just been lodged. The application on behalf of your Council is for a four-form entry primary school and nursery, as well as a mixed development of housing and employment space. The new primary school will become part of the existing nearby Kingsgate School which will then operate over two sites. The site is to be 'car-free', excepting disabled and servicing spaces.

West Hampstead is featured in Camden Council's Local Plan-supporting 'Place Plan' in which a key aim is to improve the quality of experience for people in streets and public spaces and improve pedestrian and cycling routes, a theme taken up in the draft 2014 Fortune Green & West Hampstead Neighbourhood Plan, which I consulted as it is impressively detailed and clear about transport now and as aspired to for the future.

### **Location**

The site is distant from Transport for London Route Network, Finchley Road being a kilometre away to the east, and benefits from a very good Public Transport Accessibility Level (PTAL 5, of a scale of 1 to 6 in which 6 is the highest). It is less than 400m from three stations which respectively convey the underground (Jubilee line), rail (West Hampstead Station provides regular Thameslink and Southeastern services to the north and south of London), and Overground services (Stratford to Richmond). West End Lane is served by frequent bus services C11, 139 and 328; their stops are adjacent to the station entrances. The northern boundary of the site is adjacent to a railway line (Thameslink and Southeastern) and Liddell Road and surrounding is a controlled parking zone.

Cycling infrastructure in the area is poor, as acknowledged by the applicant at our meeting, with the nearest formal routes around a kilometre away to the east and the west.

### **Trip Rate & Modal split**

An assessment of the transport impact of the development has been undertaken for 2016 when it is expected that the development will be complete. A survey was carried out in June 2014 to establish a base level of traffic flow. The assessment using person trips has considered trips by pedestrians, car drivers, car passengers, cyclists, and public transport users. It also considers the impact forecast for committed schemes in the area.

Trip generation for the proposed new second site for Kingsgate School has used a “first principles” methodology based on movement patterns associated with the existing Kingsgate School, and a 100% attendance has been assumed. This is a suitably robust approach and is therefore supported.

The applicant has identified that the split in the two school sites will result in some additional car trips and has produced a “Worst Case Family Group” modal split, which comprises Base Case vehicle modal split plus an additional 13 inter-site vehicle trips within the 15 minute peak period. However, in regard to staff travel, TfL is not convinced that all of the 12% current trips taken by car should be redistributed to other modes because “staff will not be able to drive to school”. This is contradicted later in the TA by the worst-case assumption that all vehicle trips generated by the school element of the site will have the appropriate permit to park within the area.

This being the only reservation and in the expectation that Camden Council will work closely with staff and parents on managing transport expectations and maximising sustainable trips through a School Travel Plan (see later section), the trip generation is considered realistic and acceptable. The selection of surveys on comparator sites for the school, commercial and residential uses to establish modal share is considered acceptable also, as is the split for public transport modes which the applicant has based on 2001 Travel to Work Census data for people employed in the West Hampstead Ward. The applicant should refer to 2011 travel to work statistics which *are* published, contrary to their comment in the TA.

In summary, the TA identifies the following additional vehicular trips generated by the entire development: 94 in the peak hour, 90 during the first PM peak (finish of lessons) and 90 in the second PM peak. Whilst the majority of trips to school will be by sustainable modes, the commercial development is forecast to generate 80 trips in the AM peak, 86 in PM1 peak, and 100 trips in the PM2 Peak. The residential element will produce 58 trips in the AM peak, 30 in the PM1 peak and 53 trips in the PM Peak. TfL does not require further analysis of trip generation and modal split.

### **Public Transport**

The net increase in bus demand is relatively low and the area is well served by buses, with capacity to accommodate this development’s trips. TfL is satisfied with the development’s impact on buses and London Underground and Rail services and also the applicant’s analysis of its cumulative impact with other committed schemes in West Hampstead. The only committed local scheme of significant size, at 187-199 West End Lane, contributed to improvements to the Overground station including an additional access, and the ‘Thameslink’ transport interchange improvements have been completed.

On the matter of bus passenger comfort and amenity, however, the applicant has noted the northbound bus stop adjacent to the ‘Thameslink’ station appears to have the pavement capacity to incorporate a bus shelter with seating and real-time information. TfL requests the applicant funds this specific mitigation: a shelter costs in the region of £10,000.

### **Car Parking and Access**

The development as previously mentioned is intended to be ‘car-free’ with the exception of two operational spaces for the school (as it will operate across two sites) and a vague and inadequate provision of disabled-accessible spaces.

The proposed lack of general parking is supported, but the blue-badge provision is not. Only 3 such spaces will be provided for all land uses in an on-site “shared space, arrangement to be confirmed”. It is understood that 10% of the residential units will be specifically adapted for wheelchairs and the applicant has calculated the remaining general housing could generate a demand for 9 further accessible spaces. Unfortunately the applicant has not responded to pre-application advice that its blue-badge space allocation is wholly inadequate and does not meet London Plan Standards (a minimum of one space per ten residential units). The development must meet the aims of convenient and accessible space for the disabled. Due to the elevated position of the site the

access route is at a gradient as well as at distance from the homes and workplaces, the inclusion of an on-street disabled bay in the site's allocation does not meet these aims. Furthermore it will provide only short-medium term parking and force them to compete with existing other blue-badge holders in the area for the space.

The applicant has not analysed the operational needs and management of the vehicles that the 'office' units will generate and has not drawn up a combined disabled and operational parking management framework plan in the TA. This 'hybrid' plan is desirable given the proposal is, unconventionally, to use the same very limited space(s) for both uses and more than one land-use. It has not indicated whether one of the total 5 spaces on-site will be fitted with an electric vehicle charging point, in line with the London Plan. Although it would be preferable to see details prior to determination, TfL considers a full and detailed plan should be secured by planning condition/obligation. It could form part of the Travel Plan.

### **Walking and Cycling**

To accommodate the new development, a series of public realm and traffic calming measures are proposed to mitigate the transport impacts the development, particularly movement to and from the school. This includes the relocation of an existing zebra crossing on Iverson Road, widening of footways and increased signage. These are welcomed as is the proposed traffic calming infrastructure but please note their design should follow LCDS guidance –which recommends sinusoidal profiles. Humps with a sinusoidal profile are similar to round-top humps but have a shallower initial rise and have been developed to provide a more comfortable ride for cyclists. TfL would like also to see legible London signage provided in the area, through a s106 contribution.

Subsequent to agreement of the scoping study, a Public Realm Assessment (PRA) undertaken by ABA was agreed with LBC as an alternative to undertaking a PERS audit. TfL was not informed of this move, it regrets that the report is less technical and more of a narrative than the recommended PERS audit would have been, however the observations are accurate and it is prepared on this occasion not to pursue provision of the latter

TfL welcomes the proposal to create better permeability of the site's residential and workspace elements by creating a connection between the north west corner of the adjacent pocket park and Liddell Road. For cyclists, I agree with the applicant's comments that connectivity and the environment is generally poor, with low priority given to cyclists. Camden's Local Plan policy DP17 – 'Walking, cycling and public transport' notes Development should make suitable provision for cyclists and goes on to say that the Council will expect new developments to provide appropriate, safe pedestrian and cycle links as part of schemes. At a local level, West End Lane has narrow carriageways and heavy traffic flows with little segregation from traffic. These problems are acknowledged in the neighbourhood's Plan's Policy 8 which is concerned to improve cycling, mainly to be achieved by all new development making a contribution to cycle routes and facilities. Specifically, this aims to provide improved pedestrian and cycle routes between West End Lane and Finchley Road, which would start some 400m from this site. TfL recommends this development contributes accordingly.

The applicant's proposals should also acknowledge the plans for a future Quietway in the vicinity of this site – potentially on Maygrove Rd on the site frontage - to be delivered by Spring 2016:

<http://www.tfl.gov.uk/travel-information/improvements-and-projects/quietways?cid=fs243>

The Transport Assessment's modal share analysis should make a distinct link to the this new piece of infrastructure as well, as the presence of the Quietway will attract more cyclists and cycling. Other improvements such as improved lighting and signage are well-covered in the TA's public realm proposals.

The total number of spaces provided for cyclists is to be 182 on-site and 20 on-street. Unfortunately the TA does not reference the new and intended-to-be-published London Plan (FALP) cycle parking standards, and consequently the residential total which is intended to be 110 ie one per unit will need to be increased to 1 space per studio and 1 bedroom unit and 2 spaces per all other dwellings.

There appears to be no breakdown of units by size in the information supplied so I cannot state a total. In the absence too of a breakdown in B1 uses – for which the Mayor has different stands for business offices and light industry/R&D – TfL would require the higher standard, relating to central London for long-stay ie 1 space per 90sqm and 1 space per 500sqm for short term (visitor) spaces.

### **Servicing, construction and travel planning**

As stated above, the primary access to the development would be from a new access on Maygrove Road at the western end of the site. This will act as the primary vehicle access to the different elements of the development for servicing, refuse collection, drop off/pick up and to disabled/visitor disabled parking spaces. It is proposed that the new access be managed – by school staff- using a dropped bollard which will restrict traffic during school hour pick up and drop off times. It is not explained whether blue badge holders will be similarly able to operate the bollard nor how realistic it is giving the school control given the school operates around 9-4pm term time only. Similarly, although the applicant identifies vehicular trips for the B1 units it does not address a need for servicing and operational spaces for the office, or the impacts on the highway and on the main access through the site (which also is a pedestrian route to the park) of not dedicating on-site space for this activity.

To minimise the impacts of servicing and construction and to facilitate travel planning, this particular development which I advised on as a major referable pre-application should – in accordance with the Mayor’s Transport Strategy - include comprehensive transport assessments, travel plans, delivery and servicing plans (DSPs) and construction logistics plans (CLPs), prepared in accordance with TfL’s best practice guidance. These proposals for Liddell Road are being referred to the Mayor and therefore these requirements are in line with guidance as well as necessary – especially so given the unresolved issues outlined above.

### **Community Infrastructure Levy**

In accordance with London Plan policy 8.3 “Community Infrastructure Level’, and following consultation, the Mayor’s CIL came into effect on 1<sup>st</sup> April 2012. The proposed development is within the LB of Camden , where the Mayoral charge is £50 per square metre gross internal area. More details are available via the GLA website <https://london.gov.uk> .

### **Summary**

In summary, while TfL is supportive of the proposal in principle, and considers it will not have a significant negative impact on its network, there are some question marks about how the mixed uses’ ‘shared’ needs will work in practice in a way that does not create extra activity at the kerbside especially in view of the increase in vulnerable road users associated with the Primary School and nursery. The applicant should support its application with a management plan as well as the three other framework plans requested above. TfL is keen to see cycling infrastructure improved in the area and would welcome an improvement to bus passenger amenity and comfort too, in regard to the provision of a shelter as described.

Yours sincerely

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