



Our ref: 16/0431
Your ref: 2015/2704/P

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<Sent via email only>

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Dear David

RE: 2015/2704/P – Central Somers Town – TfL's Initial Comments

I write following notification of this proposal on 2 February 2016 from the Greater London Authority (GLA) which involves the demolition of existing buildings and the provision of an upgraded Edith Nevill Primary School, community facilities, retail floorspace and 136 residential units spread out over 7 buildings. The proposal also includes upgrades to approximately 12,000m² of public open space. Following our initial assessment Transport for London (TfL) considers the application to be broadly acceptable in strategic transport terms, however it does not fully comply with the London Plan for the reasons set out in the report and that possible remedies suggested in the report could address those deficiencies.

Please note that the following comments represent the views of TfL 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 scheme. These comments also do not necessarily represent the views of the GLA, which should be consulted separately.

The proposals were the subject of a GLA pre-application meeting on 27 August 2015. At the meeting and subsequent comments issued by the GLA the general approach to the Transport Assessment (TA), blue badge and cycle parking, construction, deliveries and servicing, and travel planning were raised by TfL officers.

Site & Surroundings

The site does not front onto the Transport for London Road Network (TLRN) or Strategic Road Network (SRN). The nearest TLRN is the A501, 400m south of the site while, the nearest SRN is the A4200, 200m away to the west.

The site is highly accessible by public transport, with part of the development being adjacent to St Pancras International station where national rail and underground services on the Metropolitan, Piccadilly, Victoria, Circle and Hammersmith & City lines can be accessed. London Overground, the northern line and national rail services are

also within a short walking distance at Euston station. A new Crossrail 2 station is also proposed just south of the site with new station entrances provided at both Euston and St. Pancras stations. High Speed 2 (HS2) is also expected to begin operating from Euston station by the mid-2020s. 10 bus routes can also be accessed within a short walking distance to the site. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b.

There are three cycle hire docking stations within walking distance to the site, the nearest being available approximately 200m away to the north on Pancras Road. Two cycle routes also pass through the site along Polygon Road, Purchase Street and Brill Place with dedicated cycle paths along parts of Polygon Road and Purchase Street. As part of HS2, Polygon Road, Phoenix Road/ Brill Place will also form the most direct and convenient east/west pedestrian connections between Euston and St Pancras (as opposed to Euston Road). The nearest taxi rank is located outside the Midland Road entrance to St Pancras station.

Transport Assessment

The Transport Assessment (TA) does not conform to TfL's best practice guidance. It is unclear how the mode shift has been determined and it appears no consideration has been given to existing travel patterns to and from the school. As stated during the GLA pre-application meeting that because the school was currently operational TfL would have expected the transport assessment to be based on surveys of existing trips generated by the school. The high proportion of new trips from the school assigned to trips on the underground network seems disproportionately high and walking is disproportionately low for a school which is likely to have a localised catchment. For the assignment of trips to the public transport network, the TA will need to be amended to provide information on the likely origin or destination for each public transport mode. This could simply be bi-directional, or could relate to many points within the area of interest. The assignment of trips to particular services will then be assessed by TfL specialists.

The TA predicts that vehicle trip generation from the residential component of the scheme will be minimal due to the car free nature of the scheme and most residents are expected to travel by sustainable modes. As such, TfL is comfortable that the residential component of the development, in isolation from the school, will not adversely impact on public transport or highway networks. It is also noted that the new community facilities will also provide programmes and measures to help spread the intensity of drop-off and pick-up throughout the morning and afternoon school peaks in the local area which is supported.

As such, some further information is missing from the transport assessment and needs to be provided before TfL can confirm that the application is compliant with London Plan policy 6.3 '*Assessing effects of development on Transport Capacity*'. Depending on the outcome of a revised trip generation analysis, TfL may seek contributions to mitigate against any capacity impacts on the public transport networks.

Walking and Cycling

At the pre-application stage, TfL requested a PERS audit to be undertaken in order to identify where any mitigation is needed to the pedestrian network in the vicinity of the site. TfL welcomes that this audit has been undertaken.

The PERS and CERS audit identified a number of locations on the walking routes and crossings that are part of the pedestrian environment are sub-standard. Contributions towards addressing the recommendations set out within the PERS report should be included as part of any S111 agreement for the proposal in light of the uplift in pedestrian and cycling movements and in accordance with London Plan policies 6.9 'Walking' and 6.10 'Cycling'. TfL also notes that the Wind Study stated soft landscaping measures along Phoenix Road/ Brill Place may be required to mitigate some microclimate issues arising from the new tower.

TfL also notes that the proposal will result in enhancements to pedestrian and cycle routes through the upgrading of public open space. In principle, TfL support the public realm improvements to be delivered as part of the scheme which are complimentary to the long-term aspirations for enhanced links between Euston and St. Pancras stations.

Cycle Parking

The Transport Assessment indicates a total of 217 secure cycle parking spaces will be provided as part of this scheme which represents a total shortfall of 56 spaces (including 24 short-stay visitor spaces). After reviewing the floorspace allocated for various cycle stores across the development in conjunction with the supporting material provided TfL is not convinced that this number will be achievable. In addition, several routes to/ from the cycle stores do not meet minimum standards set out within the London Cycling Design Standards (LCDS). When two-tier racks are proposed, TfL would expect that a minimum aisle space of 2.5m is provided between racks to allow for comfortable manoeuvring of cycles. The plans provided indicate that approximately 1.8 to 1.9m has been provided. In addition, any doorway which will need to be navigated by a cyclist should be at a minimum 1m in width. As the doors leading to cycle stores open in a specific direction, TfL would recommend push-button controls to assist users in navigating these with a cycle. Specific issues to plots are identified further below.

Plot 1

16 long-stay cycle parking spaces have been provided within Plot 1. However, London Plan standards require 20 spaces to serve the residential component of this part of the development and a further 15 short-stay visitor spaces to serve the D1 land-use. The proposal should be amended to reflect this accordingly.

Plot 2

55 long-stay cycle parking spaces have been provided within Plot 2. TfL confirms that this would be in accordance with London Plan standards. An additional 3 short-stay

visitor spaces will also need to be provided to serve the flexible ground floor retail space.

Plot 3

No cycle parking has been proposed for Plot 3. London Plan standards require 6 spaces to be provided for this component of the scheme.

Plot 4

No cycle parking has been proposed for the school with the exception of 5 staff spaces and a 1m² shed for scooters. London Plan standards require 40 long-stay (including 8 staff) and 4 short-stay spaces for this component of the development. TfL does not consider this to be an acceptable arrangement.

The accompanying TA stated that this was an acceptable arrangement that had been agreed in consultation with TfL. It is not clear who within TfL was consulted on this matter and the consultants responsible for authoring the TA have been unable to provide this information despite a request from TfL. For the avoidance of doubt, the advice TfL gave as part of the GLA pre-application process stated:

“Cycle parking spaces should be identified in accordance with London Plan (2015) standards, setting out both levels of long stay and short stay spaces. In addition, storage facilities at the school for student’s scooters may be appropriate in-lieu of some cycle parking. This would need to be justified as part of the TA.”

Children under 14 have been identified as the age group most likely to cycle at least once a week in London. A lack of cycle parking was also identified by the London Assembly in its report Stand and deliver: cycle parking in London (2009) as a significant factor discouraging people from taking up cycling as a mode of transport. Even where analysis shows low current levels of cycle use (which can often be due to poor existing provision of cycling infrastructure), Mayoral policy is to grow the numbers of cycle journeys, including in areas with low levels of cycle use. Therefore, good quality cycle parking at destinations (as well as origins) is a vital part of this and cycle parking must be future proofed. As such, TfL considers that the 40 long-stay spaces and 4 short-stay spaces required by the London Plan standards should be secured as part of this development. The 4 short-stay spaces should be located close to the main entrance of the school, while plans should also indicate where further cycle parking can be accommodated in the event the school is expanded which the design future-proofs.

The TA notes that 8 staff cycle spaces will be provided, yet the plans indicate only 5 can be accommodated. In addition it is unclear from the drawings as to whether these are located in a secure area. This should be confirmed by the applicant. Appropriate end-of-trip facilities (e.g. showers/ changing room) have been provided for staff members and these should be secured by condition.

Plot 5

Plot 5 provides for 22 long-stay spaces. London Plan standards require a minimum of 31 spaces. The proposal should be amended accordingly.

Plot 6

Excluding the general space issues identified previously, the number of cycle parking spaces within Plot 6 conforms to London Plan standards.

Plot 7

Excluding the general space issues identified previously, the number of cycle parking spaces within Plot 7 conforms to London Plan standards. The applicant should also explore means to reduce the number of doorways which are required to be navigated from the street to the cycle store. The LCDS recommends a maximum of 2, while the design currently requires users to navigate 4 doorways and a lift.

Public Open Space

No specific information has been provided on the cycle parking to be provided as part of the open space upgrades although it is noted that the plans indicate that some will be provided. TfL also notes that the open space provides areas where the required visitor cycle parking from the residential buildings and school can be accommodated. The total number of 24 visitor cycle spaces required for the development could be arranged in clusters across the entirety of the development. Final numbers and locations should be clarified.

Overall, TfL does not consider the proposal as it currently stands provides appropriate cycle parking arrangements and the provision of long-stay and short-stay cycle parking spaces and supporting infrastructure is significantly below the requirements set out in London Plan (2015) Policy 6.13 '*Parking*'. Once reviewed in line with this guidance, TfL expects the cycle parking for the site to be secured by condition and /or Section 111 agreement. TfL would also encourage the proposal to expand the scooter storage facilities at the school due to their increasing popularity, particularly with younger primary students.

Car Parking

The proposal provides for a car-free development, which considering the sites excellent PTAL rating, is strongly supported by TfL. The applicant has also proposed that future residents and employees be exempt from applying for local parking permits which is also supported by TfL. These arrangements should be secured via a Section 111 agreement.

No blue badge parking has been proposed as part of the development. London Plan (2015) and the Mayor's Accessible Housing Supplementary Planning Guidance requires 1 blue badge space for every accessible dwelling (10%) or 14 for this development. TfL does not consider this to be an acceptable approach, and the applicant should take this opportunity to convert existing underutilised spaces to blue badge spaces. Preferably these should be located less than 50m from entrances to

the residential buildings will provide accessible units to provide safe and convenient access.

Travel Planning

The applicant has submitted a framework Travel Plan. TfL expect that final versions of Travel Plans for each of the major land-uses to be secured, managed, monitored and enforced through the S111 agreement.

Deliveries and Servicing

The application has provided a Framework Delivery and Servicing Plan (DSP) which is welcomed by TfL. The proposal provides for waste to generally be collected from the public highway. It is noted that this may require the construction of some loading bays on the highway in certain spaces. TfL considers this to be acceptable subject to LB Camden being satisfied with these arrangements and final DSP's should be secured via S111 agreement. Any changes to the highway should be implemented prior to occupation of the development.

With regard to deliveries, no specific information has been provided as to how these can be practically accommodated for Residential Block C (Plot 6). The distance between the building core and nearest on-street (proposed) or off-street loading space is over 100m. This will lead to increased dwell times within the loading bay or require vehicles to stop within the carriageway closer to the site to offload deliveries. As such, the proposal is not considered to be in accordance with London Plan policy 6.14 and this issue should be addressed through the final DSP.

Construction Logistics Plan

As requested at pre-application stage in accordance with London Plan policies, TfL would expect a Construction Logistics Plan (CLP) to be produced and secured by condition. TfL notes that a Construction Management Plan has been included with the application materials and this sets out a broadly acceptable approach to construction transport issues.

The CLP will need to identify efficient and sustainable measures that will be undertaken during construction of the development. This may be through consolidation of trips; secure, off-street loading and drop-off facilities; and using operators committed to best practice (members of TfL's Freight Operator Recognition Scheme or similar). It should also take into account committed developments in the wider area. The CLP should set out measures to ensure that there is safe interaction between construction vehicles, cyclists and school children in the area throughout the construction programme. In light of this issue, it may be prudent to limit construction deliveries during the surrounding schools morning and afternoon peaks.

Mayoral CIL

The Mayoral CIL applies for any new application and is a charge of £50 per sq metre (based on the gross internal floor area) in the London Borough of Camden. The CIL would be payable on commencement and the collection of the CIL would be administered by the Council who would transfer the payment to the Mayor / TfL.

Summary

In summary, the applicant should address the following issues to ensure compliance with the transport policies of the London Plan:

- (a) Review trip generation and mode share for Edith Nevill Primary School;
- (b) Secure contributions to address the deficiencies in the pedestrian environment as identified in the accompanying PERS/ CERS audit;
- (c) Reallocate underutilised on-street parking spaces to blue badge spaces;
- (d) Review cycle parking arrangements in accordance with London Plan policy and the London Cycling Design Guidelines;
- (e) Secure a DSP, CLP and Travel Plan via appropriate conditions/ obligations.

I trust this provides you with an understanding of TfL's current position on this application and we would welcome acknowledgement from you that these comments have been received and are being considered. Please do not hesitate to contact me if you have any queries.

Yours sincerely

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cc. Martin Jones - GLA