



Council reference number: 2016/5202/P

**Transport for London**  
Borough Planning

David Fowler  
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Windsor House  
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London SW1H 0TL

11 January 2017

Dear Mr Fowler

## **Remodelling, refurbishment and extension of 125 Shaftesbury Avenue**

Thank you for your letter dated 20 December 2016 consulting TfL on planning application referenced 2016/5202/FUL. The application seeks permission for the remodelling, refurbishment and extension of an existing office building (Class B1) at upper floor levels, roof level and within lightwells to provide 9,682 sqm additional floorspace. This includes terraces, a new public route, a relocated office entrance (Charing Cross Road), rooftop plant and flexible retail uses (Class A1/A3), along with associated highway, landscaping and public realm improvement.

The site is located on Shaftesbury Avenue, which is part of the Strategic Road Network, for which TfL have an oversight duty of the Traffic Management Act (2004). After assessing the application documents provided TfL have a number of concerns.

### **Cycle parking**

TfL are unable to properly assess the level of cycle parking for this development as the correct GEA figures for the whole building have not been provided by applicant. As stated in the London Plan (2015), “the standards are based on gross external floorspace, unless otherwise stated”. This demonstrates the requirement for the applicant to produce GEA figures which are inclusive of BOH and Plant; which the applicant has not done in this case.

Cycle parking in the basement is proposed to be accessed via a shared service and car park access ramp. It is accepted that a dedicated access for cyclists would be difficult to achieve. However TfL have a concern for conflict between servicing vehicles and cyclists. The demarcated pedestrian/cycle lanes on the southern part of the ramp seem contradictory to the encouragement of cyclists to demount. Seeing as the demarcated area is not shown on the plans, this should be secured by condition.

The type of cycle parking being proposed should also be clarified and this should be in accordance with the London Cycle Design Standards (2014) to encourage accessibility to all cyclists including some provision for larger bikes.

### **Car parking**

TfL welcomes the reduction in car park spaces to two and the freed up space would accommodate cycle parking, although our preference would be for a car free development from the outset. The applicant should provide further detail on the justification for the retention of the two spaces due to existing lease arrangements

including confirmation that they would be used for other purposes ( e.g. cycle parking or facilities) after the relevant lease ends. If the spaces are suitably justified their conversion to other uses should be secured by an appropriately worded S106 clause.

Given the highly accessible location TfL would not seek Blue Badge parking if this ensured that in the future at least the development was car free.

### **Trip Generation**

With regards to the trip generation the applicant has carried out a first principles approach which TfL considers to be a good method. However, TfL would like clarification of how the applicant has worked out the number additional employees in order to assess trip generation properly.

### **Construction**

The applicant has provided an outline construction management plan which is welcomed however giving the potential for construction to impact on bus services on Shaftesbury Avenue this should be secured by condition and to be approved in consultation with TfL.

### **Delivery and Servicing Plan**

The applicant has provided details on servicing arrangements as part of the TA, this should be formalised through a delivery and servicing plan which should be secured by condition. TfL welcomes that the applicant is committed to deliveries being carried out for the basement outside of peak hours.

### **Travel Plan**

A travel plan for each land use should be prepared, drawn up in accordance with TfL guidance, and this should be secured, monitored and enforced through the section 106 agreement.

Please contact me should you have any queries relating to this correspondence.

Yours faithfully

George Snape  
**Assistant Planner, TfL Borough Planning**

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