



Council reference number: 2016/6069/P

Transport for London
Borough Planning

David Peres Da Costa
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Dear David

Erection of 3 storey extension of 1 Triton Square to provide additional office space (B1), flexible retail (A1,A3 and A4), re-provision of gym (D2) and demolition of St Anne's Church (D1) to provide part 6, part 9 storey residential building with 22 units.

This letter is in response to the recent submission of the above planning application referenced 2016/6069/P and dated 4 November 2016 on which we were notified by the GLA on 22nd March 2017.

The application seeks permission for the erection of a three storey extension of 1 Triton Square to provide additional office space (Class B1) with flexible retail (Class A1,A3 and A4), re-provision of gym (Class D2) and demolition of St Anne's Church (D1) to provide part six, part nine storey residential building with 22 units.

The site is located approximately 50 metres from the closest section of the Transport for London Road Network (Euston Road) but currently and would continue to have access off borough highway.

The site has a PTAL of 6B, meaning it has excellent public transport accessibility consequent upon having fourteen bus services stopping within reasonable (PTAL) walking distance and being close to Warren Street London Underground station and Euston mainline and LU and LO station.

The site is also close to the proposed CS11 which will run between Swiss Cottage and New Cavendish Street and the Central London Cycle Grid. In addition there is a marked cycle route along the adjoining borough road, Longford Street. There is a cycle hire docking station with 54 docking points at Hampstead Road some 190 metres away, albeit this will be removed for the HS2 scheme. Other docking stations are 290 and 300 metres away.

Cycling and Walking

It is welcomed that the proposed level of cycle parking for 1 Triton Square adheres to London Plan (2015) minimum standards for cycle parking, which should be secured by condition. However it is noted that for St Anne's Church residential development cycle parking adheres to London Plan standards for long stay but there is no short stay provision. This is disappointing and notwithstanding site constraints the applicant should be encouraged to make

some provision to supplement that already existing to the west of 1 Triton Square

Clarification is sought by TfL in terms of the arrangements for access to the long stay cycle parking for 1 Triton Square; this should be in accordance with the London Cycle Design Guidance. TfL welcome lockers, changing rooms and showers should be provided for staff who cycle. Furthermore accessible long stay cycle parking spaces should be provided from the outset rather than as and when a disabled person makes a specific request.

The applicant should also demonstrate how the development would link with the Central London Cycle Grid and the proposed Cycle Superhighway and local cycle routes given the large number of expected cyclists (the TA indicated the mode share of 18.2%) consequent upon the car free proposals and the location and nature of the development. A similar point applies to consideration of the walking routes between the site and key destinations such as Warren Street LU station and Euston mainline station.

Whilst the proposed improvements to the public realm are welcomed, the arrangements for public access 24/7 on foot and cycle to Triton Square should be confirmed.

TfL would like further dialogue with the developer and yourselves as to the potential for a new cycle hire docking station at or serving the site, this should include safeguarding land and a financial contribution. For your information a new docking station costs £220,000 for a medium sized docking station. One possibility for the site would be some of the land released by the removal of the access road. The docking stations in the vicinity are heavily used and this development, especially given the high cycle mode share will put significant additional pressure on them and require mitigation in our opinion.

Car parking

The development and indeed the existing offices are car free (except for blue badge holders) which is welcomed by TfL. Staff at the development and residents on the St Anne's Church site should be excluded from applying for a parking permit and this should be appropriately secured. TfL would like to see plans showing the location of the proposed disabled car parking spaces in the basement of 1 Triton Square as none are evident.

Pick up/drop off provision

In principle TfL accept the removal of the pick up/drop off location on Triton Square however we would like to see details of the arrangements which would be made for adequate pick up/drop off facilities on Longford Street and the proposals to enable disabled people to access the site in a car or other motor vehicle in the absence of the Triton Square facility.

Delivery service plan and Construction

A Delivery and Servicing Plan should be provided in accordance with TfL guidance. Off street servicing is welcomed by TfL, along with the provision of a booking system in order to reduce congestion on the adjoining roads. It is understood that the proposed loading bay on Longford Street is proposed to remain in place, TfL believe that due to the loss of the pick up/drop off facility the enlargement of this facility should be explored in order to reduce congestion and/or its use for drop off/pick up by taxis and pre booked PHV and for disabled people.

A Construction Management Plan (CMP) has been submitted in accordance with TfL guidance and this should be secured by condition. However the CMP states that at least bronze FORS accreditation would be required. TfL welcome bronze FORS accreditation commitment from the applicants. Cycle parking, lockers and changing facilities should also be provided for construction staff.

Trip Generation and transport impact

Trip generation has been undertaken using a first principles approach which is accepted by TfL. However it has assumed that all rail trips will use Euston station. Census data only considers main mode and as such some trips will arrive at other mainline stations and use other modes (particularly underground) to access the site. This should be taken into account.

It is also noted that cycle mode share has been increased from the census figure of 1.1% to an assumed 18.2%, based on full utilisation of cycle parking from opening. Whilst TfL would support measures to encourage cycling, it is considered unlikely that there will be such a significant change in travel patterns on day one. As such, TfL would recommend assuming a more cautious cycle mode share of around 10% which applies to similar sites in the CAZ, with trips assigned pro rate to public transport modes which could then gradually build up.

Travel planning

A travel plan for each element of the development will be required to be approved by the Council prior to their first occupation. They should be secured, enforced, monitored and reviewed as part of the S106 agreement and have stretching mode share targets and contain measures to meet these targets.

TfL has reviewed the Travel Plan Framework submitted as part of the Transport Assessment and welcomes the strong site specific objectives. However in terms of number employees cycling to work, as noted above a very high mode share is assumed initially which would seem unlikely and so the targets should be adjusted accordingly. This would also enable targets to rise as Travel Plan measures take effect rather remaining stagnant.

S106 Contributions. Community Infrastructure Levy (CIL) and Supplementary Planning Guidance (SPG)

In accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the London Borough of Camden, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement. We would ask you to confirm the amount of the SPG contribution and to ensure this is incorporated into the Section 106 agreement.

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

Yours faithfully

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