Subject	1 Triton Square and St Anne's – Response to TfL's Comments on the Transport Assessment
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1 Introduction

This note addresses the comments made by Transport for London (TfL) on the Transport Assessment for 1 Triton Square and St Anne's (planning reference 2016/6069/P).

2 Cycling and Walking

2.1 Short-Stay Cycle Parking Provision for St Anne's

The London Plan (2016) cycle parking standards state that, for C3 Residential Dwellings, one short-stay space per 40 units should be provided. The proposals for St Anne's are for 22 units, i.e. a provision requirement of 0.55 space. One short-stay space is therefore required. As there is an overprovision of proposed short-stay cycle parking for 1 Triton Square located on the east and west side of the building (102 spaces in total, in excess of the minimum of 49 recommended by the *London Plan* (2016) standards), the short-stay cycle parking provision for St Anne's will be accommodated on the west side of 1 Triton Square where 24 existing Sheffield stands have been retained as over-provision.

2.2 Access to Long-Stay Cycle Parking for 1 Triton Square

The proposed long-stay cycle parking facilities (comprising 516 spaces) will be located on the ground floor of 1 Triton Square and directly accessible from a secure entrance on the eastern side of the building. The cycle store layout is compliant with the requirements set by the Camden Policy Guidance CPG7 Transport. Showers and lockers will also be provided adjacent to the cycle store, along with drying facilities. A fully accessible unisex shower and washroom will also be provided.

2.3 Links with the Local Cycling and Walking Networks

Section 4.2 of the Transport Assessment describes the local cycle network in the vicinity of the site and connections to onward destinations:

"The routes bounding 1 Triton Square and St Anne's include Longford Street and Drummond Street which are two of the many local "quieter roads that have been recommended by other cyclists". *Further south, these routes connect with a network of* "routes signed or marked for use by cyclists on a mixture of quiet or busier roads" *across Marylebone, Fitzrovia and further onward destinations into central London."*

Section 4.2 also mentions the Central London Cycle Grid, a network of Quietways and Cycle Superhighways:

"Quietway 3 (Q3), between the Regent's Park and Gladstone Park, originates at the north-west corner of the Regent's Park, some 2.9km north-west of the site and travels through St. John's Wood, South and West Hampstead, Kilburn, Willesden Green and Dollis Hill. It is planned that Q3 will connect with Cycle Superhighway CS11 in the future if the latter goes ahead."

In Section 4.6.2, further details are provided about CS11:

"*TfL is exploring the feasibility of a new Cycle Superhighway route which would be a continuous link from Swiss Cottage, in the London Borough of Camden, to Portland Place, in Marylebone, City of Westminster, via the Regent's Park's Outer Circle. The route would end at the junction with New Cavendish Street where it would link with the planned Central London Grid.*

CS11 would be accessed from the junction of the A501 Marylebone Road/Euston Road and Park Crescent/Park Square East, some 350m to the south-west of the site."

Section 4.1 provides a description of the local pedestrian network, at Regent's Place and St Anne's Church and their immediate surroundings. The key walking routes to the nearest London Underground (LU) and National Rail (NR) stations are provided with wide, clutter-free and lit footways and wide signalised pedestrian crossings with dropped kerbs and tactile paving. They are set out below:

- **Walking route to Warren Street LU station (270m)**: from the south-eastern corner of Regent's Place, access is direct across the A501 Euston Road, the station being located on the other side;
- **Walking route to Great Portland Street LU station (400m)**: from the south-western corner of Regent's Place, access is direct across the A4201 Osnaburgh Street and the A501 Marylebone Street, the station being located on the other side of the latter;
- **Walking route to Euston Square LU station (450m)**: from the south-eastern corner of Regent's Place, it is the same route as for Warren Street LU station, but then continues eastwards across the A400 Tottenham Court Road along the A501 Euston Road, to the junction with Gower Street, at the corner of which the station is located; and
- **Walking route to Euston NR station (600m)**: from the south-eastern corner of Regent's Place, access is direct across Hampstead Road, then along the A501 Euston Road where access to the station is located.

2.4 Public Access Times

Access to the public realm on foot and by cycle will be possible 24 hours a day, seven days a week, with the exception of Christmas Day where Regent's Place is closed to the public.

2.5 TfL Santander Cycle Hire Docking Station

The area surrounding 1 Triton Square is currently well served by cycle docking stations.

A TfL Santander Cycle Hire docking station located approximately 190m from 1 Triton Square (Hampstead Road, 53 bicycles) is proposed to be removed under the HS2 scheme plans. The HS2 scheme however commits to reproviding this facility. There are four other docking stations providing 93 spaces within 500m of the site, which is considered sufficient to accommodate the additional demand generated by the increase in floorspace at 1 Triton Square.

The quantum of office floorspace provided is not the reason for referral to TfL. The level of floorspace is thus not considered to be significant enough to warrant a contribution towards the TfL Santander Cycle Hire scheme in any capacity.

Furthermore, the contribution sought is noted to be in relation to a new docking station and land for the docking station. It is incomprehensible that an extension to an existing office should necessitate both the significant financial contribution and relinquishing land for a docking station. Neither of these contributions are necessary to make the application acceptable in planning terms.

Lastly, the public realm is a very important part of the proposals and significant work has been undertaken in sculpting a calm and tranquil garden space to the north of Triton Square. Much of this work would be undone in attempting to include a docking station.

For the reasons sets out above, we do not think a docking station or a contribution to a docking station is necessary or reasonable to make this scheme acceptable in planning terms.

3 Car Parking

3.1 St Anne's Residents

Residents of St Anne's will be excluded from applying for a parking permit as it is intention for the residential element of the scheme to be car-free, and this will be secured post-planning by way of a planning condition or a Section 106 Agreement. Section 5.3.4 of the Transport Assessment specifies that mobility-impaired residents that live in the two wheelchair-accessible units will be able to apply for a Blue Badge parking permit that will give them access to on-street parking near St Anne's, on the basis of one space per unit.

3.2 1 Triton Square Disabled Parking Provision

British Land is committed to entering into a Section 106 Agreement that secures the provision of disabled parking spaces for both the office and residential uses. With regard to the office provision, the legal agreement states:

"The Owner is to make available throughout the lifetime of the Office Building the On-Site Disabled Parking for use by qualifying individuals employed in the Office Building. Three On-Site Disabled Parking Spaces are to be provided in the basement of Regent's Place."

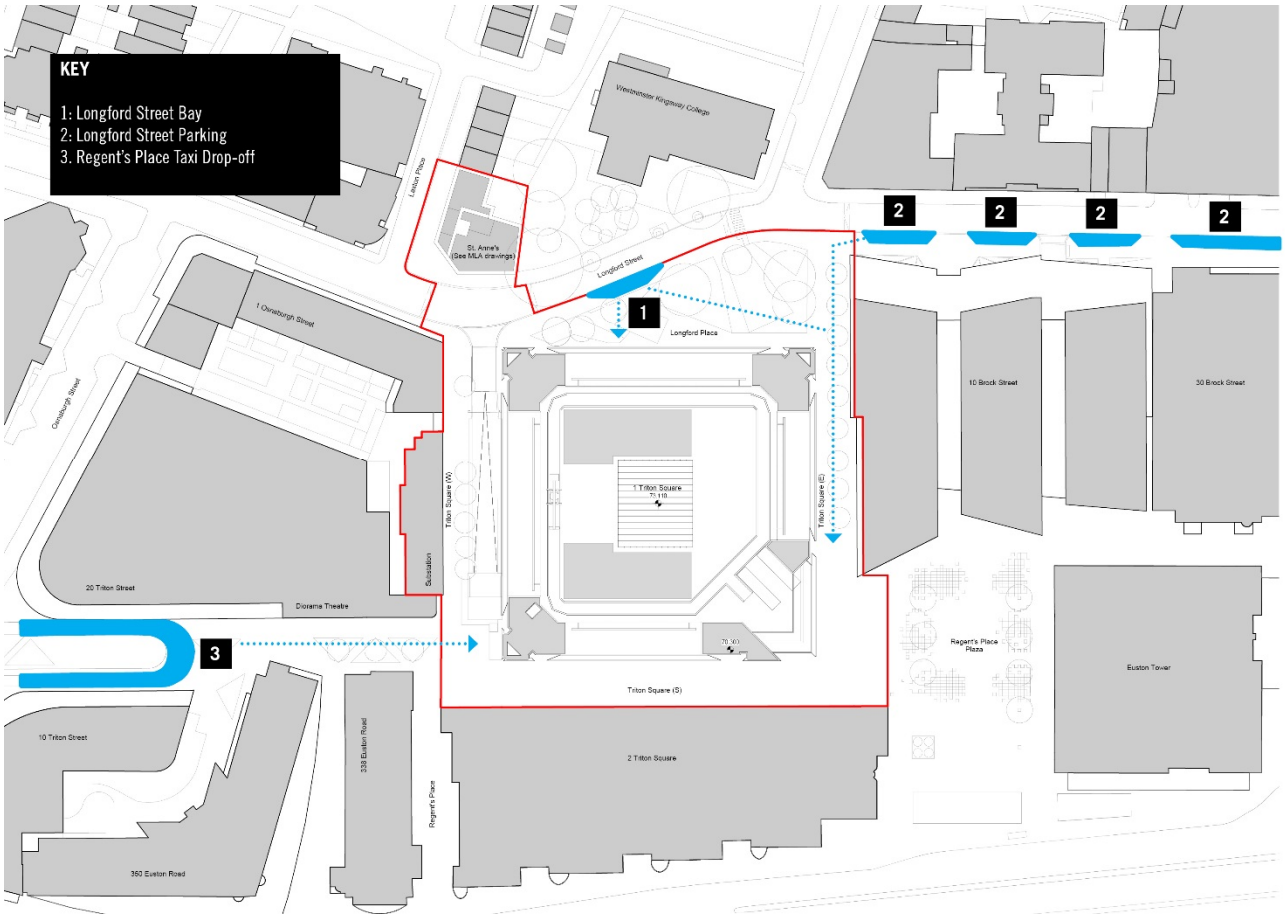
The exact location of these disabled parking spaces is subject to more detailed design work and we would look to secure the specific locations either via condition or as an additional clause to the Section 106 Agreement. Either way, the proposals will satisfy the relevant legislation on such matters.

4 Pick-up and Drop-off Facilities

The current pick-up and drop-off facilities on Longford Street are lightly used and it is considered that this will continue to be the case with the proposed development. These spaces comprise a 14m long loading bay on Longford Place and a series of 15m long parking bays north of 10 Brock Street. The removal of the taxi loop will have a limited impact on the existing Longford Street provision as taxis are able to pick up and drop off passengers safely at the kerbside along Longford Street and Drummond Street, or use the inset bays. The Longford Street bay will also cater for pre-booked private-hire vehicles for disabled people. In addition to the drop-off provision on Longford Street, 1 Triton Square is able to utilise the existing taxi drop-off loop on the western side of Regent's Place.

A plan illustrating the above is shown in **Figure 1**.

Figure 1: Taxi Drop-Off Locations



5 Delivery and Servicing Management Plan

A servicing and waste management strategy is included in the Transport Assessment as Section 7, setting out the anticipated number of delivery and servicing vehicles accessing the proposed 1 Triton Square and St Anne's developments when in operation, the proposed access arrangements, the anticipated waste generation, as well as the waste storage, management and collection strategies.

A more detailed Delivery and Servicing Management Plan will be secured post-planning by way of a planning condition or a Section 106 Agreement. It will notably review the potential for the enlargement of the Longford Street pick-up and drop-off facilities to offset the proposed removal of the Triton Square loop on the eastern side of the 1 Triton Square building, if required.

6 Trip Generation and Transport Impact

6.1 Revised Proposed Office Modal Split

Section 6.1.3.1 of the Transport Assessment sets out the modal split for the existing and proposed offices, the former being directly derived from local 2011 Census method-of-travel-to-work data and the latter being an adjustment to reflect the characteristics of the proposed redevelopment.

TfL noted that the proposed cycling mode share (18.2%), based on the assumption of full utilisation of the proposed 510 B1 allocated cycle parking spaces as early as upon first full occupancy of the office and affordable workspace areas, is unlikely to be achieved so early on, and recommended to adopt a more cautious share of 10%, in line with similar sites in the Central Activities Zone, which the site is part of.

The proposed office modal split has therefore been adjusted and the other modes have been factored up accordingly, as shown in **Table 1**.

Table 1: Revised 2011 Census Method-of-Travel-to-Work Proposed Office Modal Split

Mode	Existing Office	Proposed Office
London Underground	34.5%	31.4%
National Rail/London Overground	55.7%	50.7%
London Bus	5.4%	4.9%
Taxi	0.0%	0.0%
Motorcycle	1.1%	1.0%
Car/Van Driver	0.0%	0.0%
Car/Van Passenger	0.0%	0.0%
Bicycle	**1.1%**	**10%**
On Foot	2.2%	2.0%
Total	100.0%	100.0%

6.2 Revised Proposed Office Multi-Modal Trip Generation

The resulting person trips per mode for the proposed office are presented in **Table 2**.

Table 2: Revised Proposed Office Multi-Modal Trip Generation

	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
London Underground	526	18	543	18	526	543
National Rail/London Overground	849	28	877	28	849	877
London Bus	82	3	85	3	82	85
Taxi	0	0	0	0	0	0
Motorcycle	17	1	17	1	17	17
Car/Van Driver	0	0	0	0	0	0
Car/Van Passenger	0	0	0	0	0	0
Bicycle	167	6	173	6	167	173
On Foot	33	1	35	1	33	35
Total	1,674	56	1,730	56	1,674	1,730

6.3 Revised Total Development Multi-Modal Trip Generation

The resulting person trips per mode for the proposed development (including St Anne's) are presented in **Table 3**.

Table 3: Revised Total Development Multi-Modal Trip Generation

	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
London Underground	527	22	549	21	528	549
National Rail/London Overground	849	29	878	29	849	878
London Bus	84	8	92	8	85	92
Taxi	0	0	0	0	0	0
Motorcycle	17	1	17	1	17	17
Car/Van Driver	0	0	0	0	0	0
Car/Van Passenger	0	0	0	0	0	0
Bicycle	167	7	174	7	167	174
On Foot	34	6	42	5	36	42

	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
Total	1,679	73	1,752	70	1,683	1,753

6.4 Revised Total Net Multi-Modal Trip Generation

The resulting total net person trips per mode for the proposed development are presented in **Table 4**.

Table 4: Revised Total Net Multi-Modal Trip Generation

	AM Peak Hour (08:00-09:00)			PM Peak Hour (17:00-18:00)		
	Inbound	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
London Underground	+161	+10	+171	+9	+162	+171
National Rail/London Overground	+252	+10	+268	+10	+259	+268
London Bus	+27	+6	+33	+6	+28	+33
Taxi	0	0	0	0	0	0
Motorcycle	+5	+1	+5	+1	+5	+5
Car/Van Driver	0	0	0	0	0	0
Car/Van Passenger	0	0	0	0	0	0
Bicycle	+155	+7	+162	+7	+155	+162
On Foot	+11	+5	+18	+4	+13	+18
Total	+619	+38	+657	+35	+623	+658

6.5 Revised Impact

6.5.1 Pedestrian Movements

It is predicted that there will be a net increase of 11 walking inbound trips during the AM peak hour, where walking is the main mode (see **Table 4**). The final mode of all public transport trips will also be walking and, therefore, it is expected that the proposed development will generate an additional 440 walking inbound trips during the AM peak hour.

1 Triton Square and St Anne's are well located in between the various access points to the public transport network, meaning pedestrian trips will be distributed well across the pedestrian network. When it is considered that the pedestrian network connecting to and surrounding 1 Triton Square is of a high quality (as identified in Section 4.1 of the Transport Assessment), the network should be well suited to handling the predicted uplift in pedestrian movement.

6.5.2 Cyclist Movements

It is predicted that there will be a net increase of 155 cycle inbound trips during the AM peak hour (see **Table 4**). As identified in Section 4.2 of the Transport Assessment, 1 Triton Square connects well into the surrounding cycling network, notably including the Central London Cycle Grid system, and is located near five TfL Santander Cycle Hire docking stations. The number of trips forecast should have no notable impact on these networks.

6.5.3 National Rail Services

It is predicted that there will be a net increase of 252 National Rail inbound trips during the AM peak hour (see **Table 4**).

The Transport Assessment assumed that all additional trips would arrive at Euston station but it is acknowledged that the 2011 Census method-of-travel-to-work data only considers the main mode and, as such, some site users would also arrive at other central London rail termini and then use other modes, such as the London Underground or a London Bus service for the final leg of their journey on public transport to the site. The two scenarios for the final mode of public transport used have been considered separately and are detailed below.

Rail Commuters Using London Underground Services

Table 5 shows the central London rail termini, the total number of exits in the 2015-2016 financial year and the resulting split of arrivals at these stations in the AM peak hour, as well as the likely exit London Underground station for the final leg of site users' journey on public transport to the site.

Table 5: Breakdown of Additional Rail Trips Across the London Underground Network

Central London Rail Terminus	Total Number of Exits (2015-2016 Financial Year)[1]	Split	AM Peak Hour Rail Inbound Trips	Likely Exit London Underground Station
Waterloo	49,574,194	18.5%	47	Warren Street
London Bridge	26,925,469	10.0%	25	Warren Street
Victoria	40,575,709	15.1%	38	Warren Street
Liverpool Street	33,278,345	12.4%	31	Great Portland Street
Euston	20,838,935	7.8%	20	*Walk directly to site*
Charing Cross	14,499,076	5.4%	14	Warren Street
Paddington	18,268,037	6.8%	17	Great Portland Street
St Pancras	15,861,843	5.9%	15	Great Portland Street
Cannon Street	10,621,182	4.0%	10	Great Portland Street
King's Cross	16,680,848	6.2%	16	Great Portland Street
Fenchurch Street	9,022,299	3.4%	8	Great Portland Street

[1] Source: Station usage 2015-16 data, Office of Rail and Road, http://orr.gov.uk/__data/assets/excel_doc/0020/23357/estimates-of-station-usage-2015-16.xlsx

Central London Rail Terminus	Total Number of Exits (2015-2016 Financial Year)[1]	Split	AM Peak Hour Rail Inbound Trips	Likely Exit London Underground Station
Marylebone	7,966,477	3.0%	7	Great Portland Street
Moorgate	4,424,782	1.6%	4	Great Portland Street
Total	**268,537,196**	**100.0%**	**252**	**-**

Only one National Rail station is located within 960m walking distance of the site, Euston, and it is therefore assumed that all commuters arriving at Euston station would then complete their journey to the site on foot as it is only a 600m walk. Commuters arriving at all other central London rail termini (232 inbound trips) would likely use the London Underground and exit at Warren Street (124 inbound trips) or Great Portland Street (108 inbound trips) stations. The additional impact upon these stations is assessed in **Section 6.5.4**.

Rail Commuters Using London Bus Services

A total of 14 different bus routes, providing approximately 150 bus services, are available within 640m walking distance of the site.

Table 6 shows the central London rail termini, the resulting split of arrivals at these stations in the AM peak hour, as well as the likely bus routes used for the final leg of site users' journey on public transport to the site.

Table 6: Breakdown of Additional Rail Trips Across the London Bus Network

Central London Rail Terminus	Split	AM Peak Hour Rail Inbound Trips	Likely Bus Service to Site
Waterloo	18.5%	47	Other
London Bridge	10.0%	25	73
Victoria	15.1%	38	73, 205
Liverpool Street	12.4%	31	C2, 18, 205, 30
Euston	7.8%	20	*Walk directly to site*
Charing Cross	5.4%	14	29
Paddington	6.8%	17	27
St Pancras	5.9%	15	73, 390, 30, 205
Cannon Street	4.0%	10	73, 29, 134
King's Cross	6.2%	16	73, 30, 205, 390
Fenchurch Street	3.4%	8	205
Marylebone	3.0%	7	29, 134, 205
Moorgate	1.6%	4	73
Total	**100.0%**	**252**	**-**

Only one National Rail station is located within 960m walking distance of the site, Euston, and it is therefore assumed that all commuters arriving at Euston station would then complete their journey to the site on foot as it is only a 600m walk. Commuters arriving at all other central London rail termini (232 inbound trips) would likely use one or more of the bus routes listed above. The additional impact upon these bus routes is assessed in **Section 6.5.5**.

6.5.4 London Underground Services

It is predicted that there will be a net increase of 161 London Underground inbound trips during the AM peak hour (see **Table 4**). It is assumed that all additional trips will arrive at the stations outlined in Table 9 of the Transport Assessment in the AM peak hour.

In order to assess the net impact at station level, the additional London Underground trips have been split between the stations at which the London Underground lines are most closely accessible. As there is no information for the distribution of trips for the existing development, the distribution is based on the number of train arrivals during the AM peak hour. The resulting distributions and distributed trips are shown in **Table 7**.

Table 7: Distribution of Additional London Underground Inbound Trips in the AM Peak Hour

Station and Distance	Most Closely Accessible Line Serving the Station	Number of AM Peak Train Arrivals (All Directions)	Distribution	Additional Trips per Station	Additional Trips from Rail Commuters per Station	Additional Trips per Train (All Directions)
Warren Street (270m)	Northern (Charing Cross branch) Victoria	112	44.1%	49	124	2
Great Portland Street (400m)	Circle Hammersmith & City Metropolitan	51	20.1%	23	108	3
Euston Square	Passengers would favour Great Portland Street which offers the same London Underground services as Euston Square but is closer.					
Regent's Park (600m)	Bakerloo	44	17.3%	19	0	< 1
Euston (600m)	Northern (Bank branch)	47	18.5%	21	0	< 1
	Passengers would favour Warren Street for the Northern line (Charing Cross branch) and Victoria line services as it is closer.					
Goodge Street	Passengers would favour Warren Street which offers access to the Northern line (Charing Cross) services as well as it is closer.					
Total	-	254	100.0%	112	-	-

In the event of rail commuters using London Underground services for the last leg of their journey on public transport, it is predicted that, during the AM peak hour, an extra 173, 131, 19 and 21 passengers will arrive at Warren Street, Great Portland Street, Regent's Park and Euston London

Underground stations, respectively. These increases add an average of two/three passengers or less than one passenger per train, which is considered insignificant, and will therefore be comfortably accommodated within the existing train and station capacities.

6.5.5 London Bus Services

The proposed development is forecast to generate an additional 27 inbound trips on the London Bus network in the AM peak hour, as shown in **Table 4**. In the event of rail commuters using London Bus services for the last leg of their journey on public transport, there would be an extra 252 inbound trips, i.e. a total of 279 additional trips made by bus.

As the site is within a 640m walking distance of 14 different bus routes, providing an approximate total of 150 buses an hour, it is not anticipated that the uplift forecast (an average of an extra two trips per bus route and direction) would have any noticeable impact on the network.

6.5.6 Motorcycle, Private Car and Taxi Trips

No standard car parking is provided on site and as such the number of car and taxi trips to the site is currently, and forecast to remain, zero. It is predicted that there will be a net increase of five motorcycle inbound trips during the AM peak hour (see **Table 4**).

The forecast increases will not have any substantial impact on the local highway network. The number of additional motorcycles is well within the daily variations that would be expected in highway traffic and thus the resulting impact is considered to be negligible.

7 Travel Plans

It is understood that a Travel Plan for each element of the development will be secured by way of a planning condition or a Section 106 Agreement.