



Our Ref: 17/3920
Your Ref: 2017/1827/P

Transport for London
Borough Planning

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Camden Council
By email only

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15th September 2017

Dear David,

Re: High Holborn 294 - 295 – TfL Initial Comments

Thank you for consulting TfL on this referable planning application. TfL notes from the documents submitted that the proposal involves the erection of a 9 storey building comprising retail use (Classes A1-A3) at basement and ground floor levels, office use (Class B1) at first and second floor levels and 10 residential units (2 x 1-bed and 8 x 2-bed) (use class C3) above including plant and associated works.

Please note the following comments represent the views of TfL officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the GLA.

Location & Context

The site is bound by A40 High Holborn to the north, Lincoln House to the east, Celcon House to the west, and Lincolns Inn Private Gardens to the south. The A40 High Holborn forms part of the Strategic Road Network (SRN), for which TfL has a duty to ensure that no development has an adverse impact under the Traffic Management Act 2004.

The closest bus stop is Brownlow Street stop, opposite the site on High Holborn. However, there are other bus stops within acceptable walking distance which serve a large number of high frequency routes. Holborn and Chancery Lane London Underground (LU) stations are both less than 350m away for LU Central and Piccadilly Line services. Additionally, Farringdon station is 940m (within acceptable PTAL walking distance) away for LU Circle, Hammersmith & City and Metropolitan Line, and Thameslink National Rail services, with step-free access from the street to the platform. Consequently, the site has a Public Transport Accessibility Level (PTAL) of 6b, on a scale of 1 (poor) to 6 (excellent); an excellent level of public transport access. From 2018 Farringdon station will also be served by the Elizabeth Line.

East-West Cycle Superhighway (CS3), Tower Hill to Lancaster Gate, is some 1km south of the site via Victoria Embankment, connecting the site to key London locations. There's a local cycle path on Lamb's Conduit Street some 150m from the site, linking it to Guilford Street and other parts of the Central London Grid. Quietway 2 (Bloomsbury to Walthamstow) is approximately 750m north of the site via Guilford Street, also connecting the site to Cycle Superhighway 1 and 6. Furthermore, North-South Cycle Superhighway (CS6), undergoing extension works north from the existing termination at Farringdon Street some 750m away,



is proposed to run via Stonecutter Street to provide a direct route north to King's Cross. Cyclists at the new development could access CS6 via High Holborn. The section between Stonecutter Street and King's Cross is committed whilst the rest of the route, Elephant & Castle to Stonecutter Street, is already in place. There are 4 Cycle Hire docking stations within a 500m radius around the site, with the closest one being 150m away at Red Lion Street.

Car Parking

TfL welcomes the proposal of a car-free development and the policy of new residents not being eligible for parking permits within the local Controlled Parking Zone (CPZ), as this will maximise the benefits of a car-free development. However, there is a lack of Blue Badge parking provision. Consequently, the applicant should be asked to set out their intended arrangements to ensure that people with mobility restrictions can access the site, such as on-street disabled parking, drop-off/pick-up facilities, and use of public transport and active travel.

Cycling and Walking

The proposal includes the provision of 32 cycle parking spaces, compliant with the minimum standards in the London Plan (LP) and Camden Development Policies. However, all of these spaces are proposed to be located in the basement, making them all long-stay spaces and restricting their use to staff and residents only, meaning there's a lack of cycle parking provision for visitors. To comply with policy and to support active travel, a minimum of 6 short-stay spaces, accessible to visitors, should be provided. All cycle parking should be secured by condition.

Short-stay cycle parking should have step-free access and be located on site on the frontage in which and as close as possible to the main site entrance. If this is demonstrated not to be possible, we would suggest that you consider whether cycle parking could be located close to another entrance, a contribution to provide on footway or other public cycle parking in the vicinity of the site, increase the capacity of the neighbouring Cycle Hire docking stations, and/or additional long-stay provision with suitable physical access and management arrangements to encourage use by visitors

Details have been provided on how staff and residents will access the spaces in the basement. However, the access appears to be via a lift that will also be used for refuse services, and so details on how these two activities will not overlap, and how the lift will be maintained in order for residents and people to be able to use it after refuse has been in it, will be needed. All cycle parking spaces should follow the standards highlighted in the London Cycling Design Standards (see: <http://content.tfl.gov.uk/lcnds-chapter8-cycleparking.pdf>), and be located in suitable accessible areas within the development to facilitate use for residents and visitors. Therefore, TfL requests details on the access to the long-stay cycle parking spaces. Confirmation should also be provided as to the provision of 5% larger spaces suitable for cargo bikes, cycles used by disabled people and similar in accordance with the TfL standards.

Trip Generation

The TRICS data used for the Trip Generation calculations is considered acceptable. Compared to the previous use, 2 additional trips are expected on local bus services in the AM and PM peaks and 6-7 on LU and National Rail services.



Therefore, it is accepted that the development is unlikely to have a significant impact on public transport capacity.

Servicing & Construction

The submission of a Servicing Analysis Technical note is welcome. The proposed strategy suggests a maximum of 5 deliveries per day from the existing loading bays adjacent to the site. TfL considers the proposed strategy to be broadly acceptable. However local loading bay restrictions should always be followed.

TfL has been unable to fully analyse the Construction Management Plan due to most sections still pending confirmation. Therefore, TfL requests a complete plan to be secured by condition.

The new plan should follow new TfL best practice guidance available from <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>.

New TfL guidance requires an Outline Construction and Logistics Plan (CLP) to be submitted with initial planning applications and a detailed CLP to be conditioned for discharge prior to commencement.

Data must be supplied to TfL on land use, floorspace and construction programme to help us assess the impact of construction vehicles on the strategic transport network. The new guidance also contains measures which can be used on site during construction to reduce the negative impact of construction on London and Londoners.

Travel Plan

The submitted Travel Plan (TP) Statement is a useful introductory document but doesn't follow TfL guidelines, available within the Transport Assessment section of the TfL website: <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>. Therefore a full TP will need to be secured by condition and follow TfL guidance. The Council may also wish to consider a monitoring obligation and S106 contribution to ensure a TRICS-compliant survey is carried out in the first few years of occupation at the development.

The full TP will need to include targets for mode shift, and should signpost available TfL resources for business support, so future tenants can access them. The new Mayor's Transport Strategy (MTS) also sets a Healthy Streets target for all Londoners to do at least 20 minutes of active travel per day they need to stay healthy by 2041. This target should be central to the overall vision for any new TP, focusing the modal shift targets and measures particularly on walking and cycling.

For further information on TfL's new organisational stance towards improving public health through planning and transport planning, the applicant should refer any of the following recently published TfL documents:

- Healthy Streets for London (Feb 2017)
<http://content.tfl.gov.uk/healthy-streets-for-london.pdf>
- Valuing the health benefit of transport schemes: guidance for London
<http://content.tfl.gov.uk/valuing-the-health-benefits-of-transport-schemes.pdf>
- Improving the health of Londoners: Transport action plan (Feb 2014)
<http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf>



Transport for London

- Improving the Health of Londoners Progress Reports 1-3 (2014/15-2016/17) <https://tfl.gov.uk/corporate/about-tfl/corporate-and-social-responsibility/transport-and-health>

For all developments of significant scale and importance in central London, TfL encourages occupiers to apply as much effort and resources to travel planning as an occupier at a 'less sustainable' location would, but to different targets focused on active travel. All Londoners should share in the responsibility to make London a healthier, more active city through transport and travel planning. TfL and others offer a range of support for this, such as:

- Our programme of Cycling support here: <https://businessoffers.tfl.gov.uk/>
- Camden Cycle Skills free training by Camden Council : <https://www.camden.gov.uk/ccm/content/transport-and-streets/cycling-and-pedestrians/cycle-training-in-camden.en>
- Please consider offering Cycle Hire travel to staff for free or at a reduced price through our Cycle Hire for Business packages: <https://tfl.gov.uk/modes/cycling/santander-cycles/business-accounts>
- The TfL Business Engagement team, who have significantly increased cycling in London workplaces elsewhere: <https://businessoffers.tfl.gov.uk/who-else-has-taken-part.html>
- TfL can provide cycle maps and cycle leaflets free of charge: <https://tfl.gov.uk/forms/12419.aspx>

Mayoral Community Infrastructure Levy (MCIL)

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1st April 2012. All new developments that create 100 m² or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in Camden.

Summary

The following issues stand to be resolved between Camden Council, the applicant and TfL:

- Further clarity on how mobility-impaired pedestrians, cyclists, public transport users and motorists would safely and easily access the site;
- Arrangements on intended Blue Badge parking provision;
- The London Plan and LCDS must be met in regard to cycle parking quantum, access and design;
- A CLP, following TfL's new guidance and points made above, should be provided and secured by condition;
- A full TP, following TfL's guidance, policy and points made above, should be provided and secured by condition.

I hope these comments are helpful. Please do not hesitate to contact me if you would like any clarifications on the issues raised above.

Kind Regards,

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