



Our ref: 18/3420  
Your ref: 2018/3105/P

Gideon Whittingham  
Planning Solutions Team  
Camden London Borough Council  
*By email only*

Transport for London  
Spatial Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

4 October 2018

Dear Gideon,

## **TfL Initial Comments – RE: Lincoln House 296-302, High Holborn**

Thank you for consulting Transport for London (TfL) on this referable planning application. TfL notes from the submitted documents that the proposal involves partial demolition and erection of extensions at rear, flank and roof level and rooftop plant; change of use of ground floor Use Classes from A1, A2 and B1a Uses to provide 2 x A1 units and the remainder in B1a Use, along with associated external alternations to the elevations, provision of appropriate cycle parking, waste/recycling storage and other services.

*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 Greater London Authority (GLA).*

### **Site and Surroundings**

Lincoln House is bounded by A40 High Holborn to the north, Northumberland House – an office building to the east, the private gardens of Lincoln’s Inn to the south, and 294-295 High Holborn – a currently vacant site to the west. In August 2018, planning permission was granted to a mixed retail and residential development scheme at 294-295 High Holborn.

The site has a Public Transport Accessibility Level (PTAL) of 6b, on a scale of 0-6b where 6b is the most accessible. There are two London Underground (LU) Stations within 5-min walk from the site which are accessible from High Holborn. Chancery Lane Station is approximately 200m to the east of the site, providing access to LU Central Line. Holborn Station is approximately 400m to the west of the site with access to LU Central and Piccadilly Lines. Part of the site is within LU’s Zone of Influence,

above the tunnels and assets of Central Line. Farringdon Station is the closest railway station with National Rail services, 800m to the north-east of the site. Farringdon also provides access to LU Circle, Hammersmith & City, and Metropolitan Lines while access to the future Elizabeth Line will be available from autumn 2019.

The closest bus stop is Brownlow Street (Stop R) on High Holborn which is immediately to the north of Lincoln House. This bus stop is served by the 8, 25, 521, and N8 services which go to destinations such as Oxford Circus, Tottenham Court Road, and Waterloo. Brownlow Street (Stop S) is at the opposite side of High Holborn and served by the same bus services, providing direct access to destinations such as Bank, Bow Church, London Bridge, Stratford, and Ilford.

Cycle Superhighway 6 (CS6) runs from King's Cross to Elephant & Castle and opened fully in September 2018. This cycle route is 680m east of the site via High Holborn and Holborn. Cycle Superhighway 3 (CS3) is 1km south of the site via Great Turnstile, Newman's Row, Serle Street, Carey Street, Bell Yard, Strand, Arundel Street, and Temple Place. CS3 is an east-west cycle route that runs through central London from Tower Hill to Lancaster Gate, it is now open to cyclists in both directions while minor finishing works will continue until the end of autumn 2018. The closest TfL Cycle Hire Station is on Red Lion Street, approximately 150m north-west of the site with 33 cycle docks.

A40 High Holborn is part of the Strategic Road Network (SRN). While the Local Authority is the highway authority for these roads, TfL has a duty under the Traffic Management Act 2004 to ensure that this development does not have an adverse impact on the SRN.

## **Access**

### *Walking*

Staff and visitors will access the office from the main building entrance via a ground floor lobby. The main entrance is step-free to the pavement on High Holborn. Pedestrians and staff will access the retail units via individual door entrances at their respective retail frontages.

### *Cycling*

Staff and visitors arriving by cycles will access the building through the service entrance to the east of the main building entrance. They will then use the service lift to get to the cycle storage room at the building's basement.

### *Servicing*

Servicing visitors will access the building via the service entrance on High Holborn. Lincoln House has no vehicular access from the public highway; there are no on-site

vehicular servicing arrangements or car parking. Servicing visitors for the retail units will utilise the individual door entrances on High Holborn.

It is not clear how the site will be serviced by delivery vehicles. As a result the application does not accord with Policy T7 Freight and Servicing of the draft new London Plan - specifically sub-section (F). Also Policy 6.13 (Parking), subsections D(d) of the current London Plan which states: “developments in all parts of London must: ... provide for the needs of businesses for delivery and servicing.”

### **Healthy Streets**

The development should support the Mayor's aims (MTS, p. 23) for all Londoners to do 20 minutes of active travel each day and (p. 305) for at least 80% of trips across London to be made by active, efficient, and sustainable modes, i.e. public transport, walking and cycling by 2041.

Owing to the car-free nature of the proposal, connections and space allocated to private vehicles are minimised, and not prioritised at the expense of active and sustainable modes.

The pedestrian environment on High Holborn has reasonably wide footways and benefits from natural surveillance. Signalised crossing points within approximately 50m of the site on High Holborn in both east and west directions enable pedestrians to cross safely.

### **Cycle & Car Parking**

Existing cycle storage at Lincoln House is located in the rear yard area with 6 Sheffield Stands, i.e. 12 cycle spaces. Cycle parking for the proposed development is located in the basement of Lincoln House; 100 cycle spaces are currently proposed including 85 long-stay and 15 short-stay spaces. This level of provision is not in compliance with the draft new London Plan standards and should therefore be increased; a total of 102 long-stay and 15 short-stay cycle spaces should be provided.

The access to the cycle parking store will be provided via the service entrance at ground level on High Holborn. The store room can be reached through the service lift and it will only be accessible to people who have a building pass, hence no short-stay cycle parking is currently proposed in the development which is unacceptable.

TfL is concerned about the capacity of the servicing lift to cope with the demand of cyclists during AM and PM peaks, and further information should therefore be submitted to demonstrate that the servicing lift is big enough and has the sufficient capacity to cope with cyclists arriving and departing during peak hours. TfL requests

the developer to install Sheffield Stands on High Holborn to accommodate short-stay visitors arriving by cycles.

The provision of ancillary facilities including changing rooms, showers, and lockers is welcomed. However, the current minimum width of the access route to the cycle store (including the servicing entrance door) of 1.898m, as stated in the DAS, is not considered wide enough to accommodate larger cycles and their users. In line with the London Cycling Design Standards (Chapter 8 – Cycle Parking), a minimum external door width of 2m is recommended. Also, any door to a cycle parking area should be automated – push button or pressure pad operated.

There is no proposed (or current) vehicle parking at Lincoln House which is supported by TfL.

### **Trip Generation**

TfL welcomes the submission of a Trip Generation analysis within the TA using the TRICS database. In terms of site selection, the comparison sites i.e. Bank, Monument, and Holborn Circus are considered appropriate as they are similar central London locations.

Since the proposed uplift in floor space compared to the current use is just 2,396 m<sup>2</sup> (GFA), TfL accepts that the redevelopment is unlikely to have adverse impacts on the strategic highway network or London's public transport network after its completion.

### **Construction**

Having assessed the Framework Construction Management Plan, we are concerned about the potential impacts of construction on the bus network, especially any bus stop or bus lane closures that might be required. Further information on construction works and management must therefore be submitted before TfL can examine the overall impact on our transport network.

The applicant should actively explore the possibility of carrying out construction works outside of the bus lane operating hours; alternative options for construction that do not require bus lane/bus stop closures would be preferable. If any closures are genuinely necessary, they need to be supported by robust evidence which should clearly demonstrate how long and on what dates they are required.

We request the applicant to conduct a traffic count on High Holborn by vehicle types (i.e. buses, cars, light vans, HGVs, and others), hours, days, and directions to identify the most appropriate operating hours for construction works. This should act as evidence to guide the Council's and TfL's decision-making and help determine the

most appropriate mitigations for any necessary lane closures. The construction impacts on the bus network during different phases of the redevelopment must also be clarified.

High Holborn is very tight space which means it may not be possible to relocate the westbound bus stop to a temporary location. Furthermore, compensation for bus delays based on an agreed benchmark will need to be agreed with TfL Buses in the event of any necessary bus lane closures.

TfL requests that a full Construction and Logistics Plan (CLP) is secured by condition discharged in consultation with TfL to address to above concerns. This should follow new TfL's Best Practice Guidance which contains measures that can be used to reduce the negative impacts of construction on London and Londoners. More information is available from: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>

### **Delivery & Servicing**

TfL understands from the Transport Assessment that deliveries and servicing of the site will be carried out on-street, as per the existing building. Any stopping or loading should therefore follow the on-street parking restrictions on High Holborn and be carried out outside the hours of 8:30am to 6:30pm between Monday and Friday and 8:30am to 1:30pm on Saturday. This should be secured by condition.

TfL is concerned about potential conflict between cyclists and servicing visitors using the proposed shared lift. We request further information on how many servicing trips will be generated and the capacity of local on-street loading bays, which may also require surveys prior to determination.

### **Travel Planning**

The submission of a Travel Plan (TP) along with the TA is welcomed. The objectives and measures are largely in conformity with the Mayor's (MTS) aims to promote sustainable and active travel through reducing vehicle trips and are therefore supported.

As Lincoln House has no vehicular access and no vehicle trips will be generated by the redevelopment, it is appropriate for the TP objectives to focus on implementing actions to promote active travel and public transport rather than on modal share targets.

### **Planning Obligations**

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1<sup>st</sup> April 2012. All new developments that create 100m<sup>2</sup> 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 the London Borough of Camden. The required CIL should be confirmed by the applicant and the Council once the components of the development have been finalised. Therefore, for this development the Mayoral CIL contribution should be at least £110,000.

The site is within The Central London charging area where Section 106 (S106) contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Crossrail funding' (March 2016). In these situations, the Mayoral CIL charge (not the Borough's) will be treated as a credit towards the S106 liability. The practical effect of this will be that only the larger of the two amounts will normally be sought. As the CIL charge will not be confirmed until development is about to commence, the S106 agreement will need to be worded so that if the S106 contribution based on the assumed CIL proves incorrect the contribution is adjusted accordingly (assuming it is still more than the CIL).

### **Summary**

TfL currently objects to the application on strategic transport grounds and the following issues need to be resolved in discussions between TfL, Camden Council, and the applicant:

- Cycle parking provision that complies with the draft new London Plan
- Provision of short-stay Sheffield Stands in publicly accessible area
- Evidence to demonstrate that the shared lift between cyclists and servicing will cater for both uses
- A full CLP to be secured by condition to address TfL's concerns
- Further clarification on how the site will be serviced
- Section 106 (S106) funding for Crossrail and Mayoral CIL

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

Yours sincerely,

Chris Leong

**Assistant Planner – TfL Spatial Planning**

Email: [ChrisLeong@tfl.gov.uk](mailto:ChrisLeong@tfl.gov.uk)

Direct line: 020 3054 7055