

<b>To</b> Peter Davis, Project Director, TP Bennett	<b>Date:</b> 09/10/2018
<b>cc</b> n/a	<b>Ref:</b> 5718/001/002

### Parcel of land off Stephenson Way

#### Response to Objection

1. This technical note has been produced in response to an objection received for the redevelopment of a parcel of land located on Stephenson Way. The site is at present a vacant plot of land and the development proposals seek to construct a 78-bed student accommodation building, with associated facilities.
2. The objection was received from 222 Euston Road, which lies to the rear of the proposed development site and is based on their concerns over maintaining the use of their existing ramped access (from Stephenson Way), which neighbours the development site.
3. This note provides responses to each of the points which were raised in the 'Review of Application Submission' technical note, produced by Pell Frischmann, in support of the objection.

#### Hotel land use

4. In relation to the proposed hotel land use, Pell Frischmann state the following:  
*'The trip generation study considers only the student accommodation use [...] It is considered that a trip generation exercise should also be undertaken for the hotel use as this will have a very different trip profile when compared to student accommodation. There is no discussion in the TA on how the increase in taxis or private hire vehicles could be accommodated on Stephenson Way.'*
5. During the scoping process it was agreed with the Highways Officer (Steve Cardno) that it was not necessary to undertake a trip generation exercise for the hotel/hostel land use due to it accounting for a small part of the year and the fact that traffic is generally lighter during the summer months.
6. With regards to how the increase in taxis on Stephenson Way it is anticipated that such vehicles would arrive and depart relatively spread out across the day. Additionally, taxis and private hire vehicles have typically short dwell times and as such they are anticipated to have a negligible impact on Stephenson Way, which is a street with relatively low traffic flows.

#### Stephenson Way footways

7. In relation to the impact on the footways of Stephenson Way, the following is stated in the Pell Frischmann technical note:  
*'On-site observations are that the footway ranges between 1.25m and 1.3m wide outside of the entrance gate to the ramp to 222 Euston Road. Given the TA states people are already walking on-street, and that*

*vehicles flows and pedestrian footfall are predicted in the TA to increase, it is suggested that the width of footways could be considered inadequate following the construction of the proposed development.'*

8. The trip generation exercise determined that the peak hour with the highest level of trips starting or ending on foot was 17:00-18:00, when a total of 43 two-way trips would occur by pedestrian and public transport modes. This level of trips would result in an additional 0.72 pedestrians per minute walking along Stephenson Way in the peak hour, which is considered to be low.
9. It is noted that Stephenson Way is a one-way road, which is subject to relatively low traffic flows, which encourages pedestrians to walk on the carriageway, rather than the narrow footways. The narrow overall width of the street is preventative in providing improvements to the pedestrian environment, without causing detriment to the operation of the street for vehicles for delivery and servicing purposes.
10. As such the continued use of the carriageway as a walking route is considered to be allowable on the basis of the low pedestrian and vehicle flows.

### **Start and end of term**

11. The Pell Frischmann Technical Note identifies that no information is provided in relation to the start and end of the university term, when students will move in and out of the accommodation. The Transport Assessment produced by Robert West stated that a strategy for these activities would be detailed within a Travel Plan (which would be secured by Section 106 agreement).
12. It is anticipated that the strategy would include a booking system where students are allocated a time slot in which they would be allowed to have a car or delivery vehicle arrive to drop-off or collect their belongings at the start or end of the school year. The site management team would oversee these activities to ensure that they are done efficiently and safely and to ensure that Stephenson Way does not become obstructed. This is a commonly used strategy at student accommodation sites.

### **Disabled Parking**

13. It was raised by Pell Frischmann that no blue badge holder parking would be provided within the site and that site users with mobility impairments would require the use of on-street parking bays. It is also mentioned that no parking space occupancy data was provided within the TA.
14. The Transport Assessment made note of the ability of blue badge holders to park within pay and display bays and resident permit bays (with no charge or time limit) due to the site being located outside of the Camden Green Badge Zone. Additionally, visitors could park on single or double yellow lines for up to 3 hours if displaying their blue badge and clock.
15. Robert West raised the lack of disabled parking bay provision (due to space constraints within the site) through the scoping process. This item was agreed with Highways and it was also agreed that no parking surveys were required due to the car-free nature of the development.

### Cycle Parking

16. Pell Frischmann raised that the proposed 39 cycle parking spaces for long-stay parking does not meet the requirements of the new London Plan.
17. It should be noted that the new London Plan is still in draft and is therefore not yet adopted. As such the proposed provision of 39 long-term spaces, which is in line with the current London Plan standards is considered appropriate.

### Delivery and Servicing Plan

18. With regards to delivery and servicing the following is stated in the objection technical note:  
*'The service and delivery plan is stated as it will be secured by a condition, however it is not clear in the TA how refuse collection could be undertaken without impeding access and movement on Stephenson Way. It is also not clear whether the location of the bin stores and holding locations are within the carry distances required by British Standards.'*
19. Refuse will be transported to Stephenson Way, from the basement level by a member of the site management team, where it will be collected. Refuse vehicles will stop for a short period of time to empty the refuse containers before returning them to the kerb, where a member of the site management team will return them to their basement store, thus limiting the dwell time of the vehicle.
20. Whilst it is acknowledged that Stephenson Way is a narrow road, which may become obstructed for brief periods while servicing takes place, it is noted that servicing activities generally occur early in the morning where there is limited demand for access by other vehicles.
21. Additionally, Stephenson Way is backed onto by a number of properties and is primarily used as the delivery and servicing route for many of these developments. As such the route is already subject to servicing demand and the addition of the proposed development site would have a minimal impact on the existing operation of the street at this time.
22. The British Standard guidance 'Waste management in buildings – Code of practice' (BS 5906:2005) details that waste storage containers with four wheels should not be manoeuvred by collectors by a distance of greater than 10m. As the waste will be moved to the kerbside by a member of the site management team it is anticipated that the refuse vehicle will pull up adjacent to the section of kerb where the refuse bins are left by the site management team, for collection, with as short a distance for collection as possible (potentially a drag distance of less than 5m).
23. The standards limit the drag distance to 10m or less drag distance for collectors *'to achieve an economical service'*, rather than any other potential reasons. It is therefore considered that the drag distance of approximately 30m from the store to the kerb is acceptable for the site management team to undertake.

### Construction Impact

24. The Pell Frischmann technical note states:  
*'The impact of construction vehicles and staff vehicles is also acknowledged as having a short term impact on the local highway network. Information should be provided on how the impact will be mitigated, and*

*confirmation is required to provide confidence that the construction activity will not impede access to via the application site to the rear of 222 Euston Road.'*

25. Through the scoping process it was agreed with Highways that a detailed Construction Management Plan (CMP) would be secured as a planning obligation via a section 106 agreement and that a framework CMP should be submitted in the first instance.
26. The framework CMP was completed by TP Bennett and submitted as part of the planning application, this document provides the details of the activities and management measures to be in place during the construction period.

### **Continued use of access and ramp**

27. The Pell Frischmann report also details the concerns relating to the proposed development and how it will impact on the existing access ramp to 222 Euston Road, to the rear of the development site.
28. It is understood from their response that at present 222 Euston Road use this ramp to gain access to their site for both cars and 4.6t light vans for uses which include delivery and servicing.
29. The concerns raised relating to the continued use are as follows, Robert West's responses to each point have been provided in green alongside each point:
  - i. The ramp dimensions would reduce following the redevelopment.
  - ii. The previous swept path drawings do not show how vehicles would turn within the site.
  - iii. Only access by large car was considered in the TA.
  - iv. A large car can only access the site if perfectly positioned and the movement would be very tight. They also state that larger private vehicles such as 4x4s and SUVs would not be able to gain access.
  - v. Pell Frischmann's swept path analysis shows that a 4.6t van would require the use of the car parking area to the north of the ramp to turn, which falls outside of the red line boundary of 222 Euston Road.
30. The following points address the comments summarised above:
  - i. In relation to points i-iii: while the ramp dimensions will change as a result of the development a delivery vehicle will still be able to successfully navigate the ramp, as shown in the attached swept path analysis. The aforementioned swept path analysis drawing shows that a 3.5t panel van can successfully turn within the site. Pell Frischmann's tracking demonstrates large cars can successfully turn within the 222 Euston Road site.
  - ii. Point iv suggests that cars would have great difficulty in accessing the site. It is known from experience that swept path analysis presents a worst-case scenario in terms of vehicle movements and in reality vehicles are able to access and manoeuvre developments more easily than is necessarily demonstrated by the software. As the swept path drawings show that a large car can successfully access the site, it is anticipated that in reality this is not only feasible, but would be more easily achieved than demonstrated on paper. A swept path analysis drawing, attached to this note, shows that a 4x4 can access and egress the

site in forward gear. It is noted that a Land Rover Discovery weighs 2.4t, while a typical Range Rover weighs over 2.5t and a Toyota Landcruiser weighs 2t. As such the use of 4x4/SUV vehicles could result in a breach of the weight restriction, once laden with persons and belongings.

- iii. Point v suggests that turning is only feasible for a 4.6t light van if it can use the parking area to the north of the ramp. While vehicles associated with 222 Euston Road may currently use this area to turn, it does not fall within their red line boundary and as such they are not entitled to use this area. This point stands regardless of whether the proposed development site is redeveloped or not.

31. The view of Robert West is that 222 Euston Road is potentially in breach of 'The Oakwood deed of grant of right of way and variation of lease', which grants the property access rights via the ramp down into their site. The agreement document states the following:

*'Oakwood as beneficial owner of the Oakwood Property and Thurston to the extent of its interest for themselves and their respective successors in title hereby grants under NBR a right of way for NBR and the persons deriving title under it and all persons authorised by them (in common with Bride Hall and the persons deriving title under it and all persons authorised by them) at all times by day and by night and for purposes of access to and egress from the Thurston Property with or without motor cars and other vehicles not exceeding in weight in any case (laden or unladen) two tons ten hundred weight to and from the said street known as Stephenson Way from and to the Thurston Property over and along the Roadway constructed upon the land shown for.'* (note: two tons ten hundred weight is equivalent to 2.5t)

32. It is understood from the objection note that at present 222 Euston Road use 4.6t delivery vehicles, where 4.6t refers to the total potential weight of the vehicle when laden. Desktop research has determined that a typical Renault 4.5t van of this type weighs 2000kg when unladen.
33. As such for a vehicle of this size to be used and comply with the limit in the deed of 2.5t, they can only have a load of 500kg, which is considered to be low. This would result in the vehicles carrying small loads and having a large amount of residual space.
34. It is therefore considered unlikely that these 4.6t vehicles going to the site with loads this light and it is therefore anticipated that the vehicles going to the site are transporting greater loads which would be in breach of the agreement.
35. This arrangement should not be allowed to continue due to weight restriction. Any failure of the ramp could, as a result of overladen vehicles, result in damage to the neighbouring buildings and even death of a vehicle driver or pedestrian within the parking area. This presents a risk to the developer/operator of 222 Euston Road.
36. A tracking exercise has been undertaken by Robert West (see attached drawing) show that a 3.5t panel van can access and egress the site in forward gear and turn within the parking area to the south of the ramp which is land associated with 222 Euston Road. A Renault vehicle of this size would weight less and therefore allow a greater load to be carried, while still complying with the Right of Way deed.

37. Online research suggests that a 3.5t Renault van would weigh 1700-2000kg, dependant on whether it is a front or rear wheel drive vehicle, resulting in loads of up to 800kg being possible with this size of vehicle. It is noted that this still represents a relatively light load, which suggests that there is potential to transport heavier loads using a smaller vehicle.
38. It is however noted that the height of a 3.5t panel van is typically 2.565m in height, while there is understood to be just over 2.6m in clearance down the vehicle ramp, following the construction of the building. Typically, a 10cm tolerance would be applied, to allow for differences in vehicle heights due to factors such as tyre pressure, suspension, etc. On this basis it is anticipated that a 3.5t panel van can fit up and down the ramp, however there is a risk that some vehicles of this size would not fit (ie if have a roof rack or long aerial, on top of the vehicle).
39. Online research determined that Renault 3.5t vans have a typical overall height (unladen) of 2.252-2.283m and would thus fit. It is anticipated that the vehicle profile used for the tracking exercise includes some tolerance or is based upon an especially large vehicle.
40. On this basis it is considered a typical 3.5t panel van would be able to access and egress the site successfully in forward gear, while also complying with the weight limit imposed on 222 Euston Road.
41. Alternatively, should larger vehicles be required, or vehicles with a load which exceeds the ramp's weight limit, then the development should seek for delivery vehicles to reverse into the access and then use an electric pallette truck to transport goods from street level on Stephenson Way.
42. It is therefore concluded that 222 Euston Road can still receive deliveries, which are of an appropriate weight, following the construction of the proposed development.

## Appendix A – Swept Path Analysis

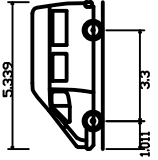




**DO NOT SCALE OFF THIS DRAWING**

Notes:

1. The contractor is responsible for verifying all site & setting out dimensions before commencing work.
2. This drawing is to be read in conjunction with all relevant Architectural and M & E drawings.
3. All dimensions in millimeters unless stated otherwise.



3.5t Panel Van  
 Overall Length 5.339m  
 Overall Width 1.986m  
 Overall Body Height 2.565m  
 Min. Body Ground Clearance 0.238m  
 Track Width 1.986m  
 Lock to lock time 4.00s  
 Kerb to Kerb Turning Radius 6.400m

Client <b>VALEO MANAGEMENT LTD</b> Delta House 175-177 Borough High St London SE1 1HR t: 020 7939 9916 f: 020 7939 9909 www.robertwest.co.uk	Project <b>STEPHENSON WAY</b>	Status <b>PRELIMINARY</b>				Drawing Title <b>SWEPT PATH ANALYSIS 3.5t PANEL VAN ACCESS AND EGRESS</b>	Scale 1:250 @ A3
Drawing No. 5718		Project No. 001	Discipline T	Drawing No. 002	Rev -	By -	Appr -

Rev	Date	By	Comment
-	-	-	-
-	-	-	-





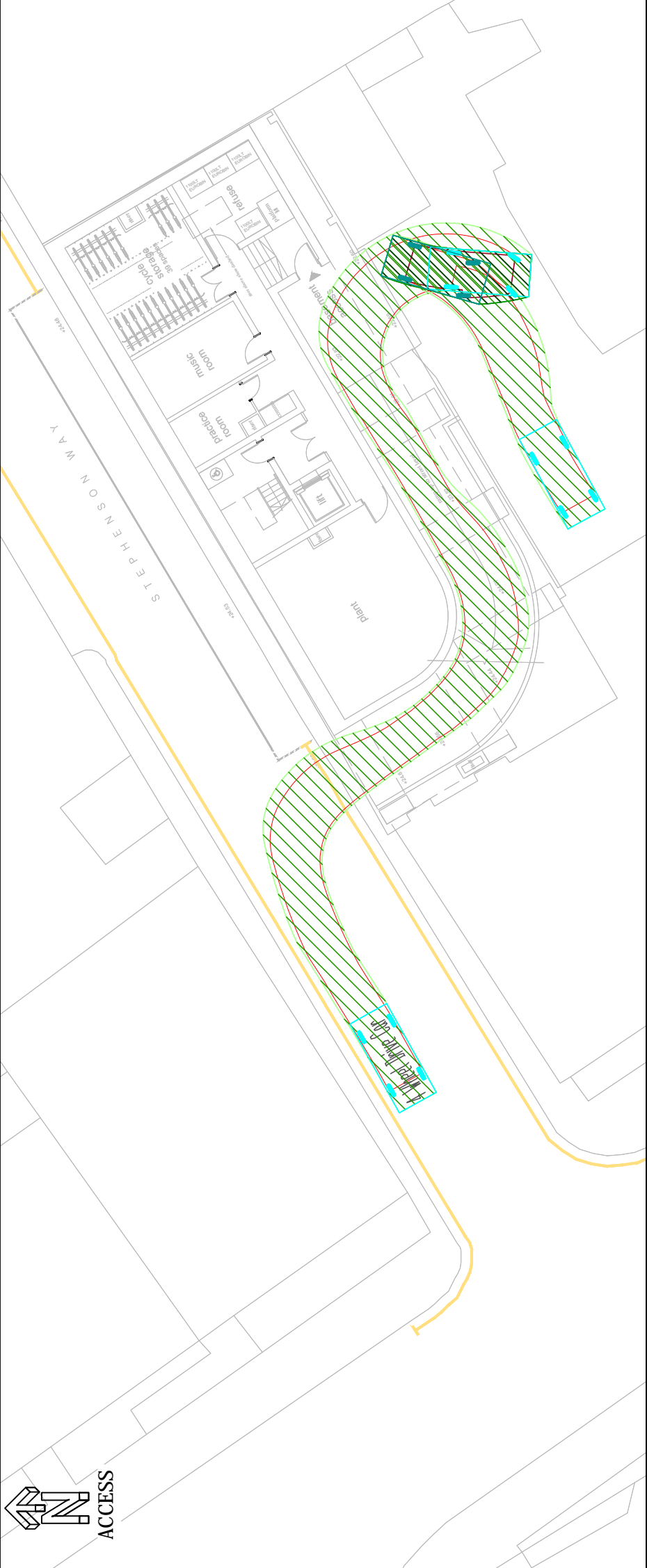
ACCESS

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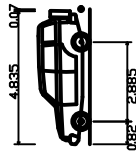
Institute of Small Scales



EGRESS



Institute of Small Scales



4 Wheel Drive Car

- Overall Length 4.905m
- Overall Width 2.009m
- Min Body Height 1.817m
- Max Body Height 1.817m
- Lock to Lock Time 4.005m
- Kerb to Kerb Turning Radius 5.725m

Client <b>VALEO MANAGEMENT LTD</b>	Project <b>STEPHENSON WAY</b>	Status <b>PRELIMINARY</b>			
		Drawn By SM Date 08/10/18	Checked By AM Date 08/10/18	Approved By AM Date 08/10/18	Scale 1:250 @ A3
Drawing Title <b>SWEPT PATH ANALYSIS 4 WHEEL DRIVE CAR ACCESS AND EGRESS</b>		Client No. 5718	Project No. 001	Discipline T	Drawing No. 004
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