

From: McLaughlin Gavin [REDACTED]
Sent: 19 June 2019 17:31
To: Planning [REDACTED]
Subject: 2019/2773/P - TfL comments

Dear Camden Planning

2019/2773/P

Space House 1 Kemble Street 43-59 Kingsway London WC2B 6TE

Thanks for consulting TfL on this planning application.

- TfL accepts that the trip generation associated with the proposed development is unlikely to cause a severely negative impact on London's strategic walking, cycling, public transport and highway networks.
- Two serious collisions have occurred in recent years at the junction between Kingsway and Keeley Street (see Transport Statement para 2.21).

In response Para 2.27 suggests that: 'The provision of a raised table crossing at the Keeley Street entry of the junction with Kingsway should be investigated, as this would afford greater priority to pedestrians and may serve to have a beneficial impact in pedestrian safety terms'.

TfL Spatial Planning agrees with this idea and would suggest the Council considers funding this highway improvement via local CIL.

- Car parking would reduce from 48 to 4 spaces which is strongly supported in accordance with Policy T6 (Car parking) of the draft new London Plan. However, TfL seeks confirmation from the applicant that the 4 spaces left would be available for servicing and disabled parking only. TfL would not support any private car parking being maintained at this site, which should be accessed almost entirely by active travel and public transport. This should be ensured by condition.
- The proposal for short-stay Cycle Parking is lower than the short-stay requirement under Policy T5 (Cycling) of the draft new London Plan and Table 10.2 (Minimum cycle parking standards). Justification is offered for this which may be acceptable to TfL, depending on the quality and accessibility of the long-stay cycle parking proposed.

For TfL to assess this further please provide drawings and details of the proposed long-stay cycle parking which enable us to assess the long-stay cycle parking proposed against the London Cycle Parking Design Standards (LCDS), specifically in terms of its general convenience and safety, the aisle widths between all racks, the different rack types proposed (e.g. any double stacked), lift dimensions and locations, the number of doors cyclists will need to pass through and whether they will be automatically operated, and the proportion of cycle parking which would be accessible by larger cycles such as cargo bikes, tandems, and those used by people with different mobility needs.

- The development proposal would improve the pedestrian environment by removing the vehicular crossover on Kemble Street and reinstating it as footway, which is strongly supported under Policy T2 (Healthy Streets) of the draft new London Plan.

However Para 5.25 of the submitted Transport Statement refers vaguely to 'an aspiration of the scheme that has been discussed with LBC planning and highways officers is a potential kerbed build-out at the junction of Kemble Street and Wild Street. This would rationalise the kerb lines at this junction and was agreed with LBC would be a beneficial traffic calming solution and public realm enhancement.'

A financial contribution to these proposed public realm improvement works by this development should be clarified and secured now, with an exact contribution amount agreed by the applicant and Council prior to determination - in accordance with Policy 6.9 (Cycling) parts c, d and e and Policy 6.4 (Enhancing London's Transport Connectivity) of the current London Plan, and draft London Plan Policies T2 (Healthy Streets) in particular part D2, T3 in particular part B, Table 10.1 which includes 'Healthy Streets and active travel'; 'Vision Zero'; and 'Walking: improved local routes', T9 (Funding transport infrastructure through planning) particularly part C and D7 (Public Realm) particularly parts B, C and D.

- The CMP is not acceptable and **TfL Spatial Planning therefore currently objects to this application.** We request production and submission of an Outline Construction Logistics Plan (CLP) in accordance with TfL guidance at <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>

The CMP submitted does not provide sufficient detail for TfL or the Council to properly assess construction impacts at this stage, particularly as it gives no expected vehicle numbers or information on the routes construction vehicles will use to access the site, including any access proposed from Kingsway which is part of the Transport for London Road Network (TLRN).

As a result it is currently unclear whether the proposed development would cause a severely negative impact on local public realm and London's strategic transport network during construction.

The responses given in the Council pro forma at pages 19 and 20 are particularly poor. They give almost no information on what construction will actually be like when it occurs, potential negative impacts and how such impacts will be prevented or mitigated.

Planning applicants need to take responsibility for how developments they wish to receive planning permission will be constructed prior to determination of their application by relevant planning decision makers. Repeatedly stating that Principal Contractors due to be appointed later will take responsibility for all construction impacts does not represent Best Practice for minimising the negative impacts of construction on Londoners and London's strategic transport network, and the Council should not accept this approach.

I look forward to receiving further updates on this case and will be happy to provide further comments prior to determination.

Thanks and kind regards,
Gavin McLaughlin | Principal Planner
Spatial Planning | City Planning



We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more info please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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