

Job Title: Space House
Job No: 2018-3758
File Ref: N12-DP-SM-TfL Transport Response Note (190807).docx
Date: August 2019

Subject: **Space House - Response to TfL Comments**

Introduction

1. Caneparo Associates is appointed by SLQR Trustee No.1 Ltd & SLQR Trustees No.2 Ltd as Co-Trustees of SLQR Unit Trust No.3 ('the Applicant') to provide traffic and transport advice associated with the applications for planning permission and listed building consent (Ref: 2019/2773/P and 2019/27901/L) at Space House, 1 Kemble Street & 45-49 Kingsway ('the Site'), in the London Borough of Camden (LBC).
2. The applications seek planning permission and listed building consent for the: *'Removal of existing roof plant equipment at 1 Kemble Street and erection of a single storey facsimile floor plus one setback floor; removal of roof plant from 43-59 Kingsway and erection of a single storey set-back extension; enclosure of the southern external stair at ground floor level on Kingsway with slimline glazing replacement windows and new glazing at ground floor level across the site; enclosing the redundant petrol filling station area with slimline glazing; façade cleaning; new landscaping and public realm works and internal alterations to both buildings in connection with their refurbishment and change of use from Class B1 offices to Class A1/A3 and flexible Class B1/B1 and events space (sui generis) at part ground and basement levels'*.
3. This Transport Note has been prepared as a response to comments raised by Transport for London (TfL) on the planning application (Ref: 2019/2773/P), dated 19th June 2019. The comments received are highlighted in *italics* with a response to each provided under the following headings.

Trip Generation

"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".

4. The Applicant notes that TfL accepts that the development will generate a low level of additional two-way trips and that no further action is required in this regard.

Collision Data

“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”.

5. The Applicant notes TfL’s position and will continue to liaise with LBC in this regard.

Car Parking

“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”.

6. The 4 retained car parking spaces will include 1 disabled parking space; and two spaces will be provided as Electrical Vehicle Charging Spaces. The 3 ‘standard’ car parking spaces will be available to employees of the development. Their inclusion within the development has been confirmed as acceptable by LBC Highways in line with the significant reduction in car parking overall.
7. It is anticipated that a ‘car-free’ obligation will be included within the S106 Obligations.

Cycle Parking

“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 enables us to assess the long-stay cycle parking proposed against the London Cycle 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”.

8. The Applicant is willing to accept a suitably-worded planning condition requiring the submission and approval of further details regarding the long-stay cycle parking provision. A planning condition of this nature is also sought by LBC Highways.

Public Realm Improvements

“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".

9. The Applicant notes TfL's position and can confirm it is currently in discussion with LBC Highways regarding the scope of the public realm improvements, with the measures and contributions to be agreed prior to determination and included as part of a S106 legal agreement for the scheme.

Outline Construction Logistics Plan

"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..."

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".

10. In recognition of TfL's concerns, an Outline Construction Logistics Plan has been prepared and submitted separate to this Transport Note. This gives greater consideration for how the development will be constructed and provides mitigation to alleviate concerns regarding the impact of construction traffic, in line with the Mayor's Healthy Streets Approach and TfL's CLP guidance (July, 2017).