



Transport for London

To: Patrick Marfleet – London Borough of Camden

From: Jack Kinder - TfL

Our Ref: CMDN/19/295

Your Ref: : 2019/3091/P

16/10/2019

Dear Patrick,

Many thanks for consulting TfL, with regards to the above planning application, TfL has the following comments:

As the development is very close to London Underground (LU) infrastructure and assets, we have consulted LU Infrastructure Protection team to provide comments, which will be provided separately in due course. TfL advises the Council not to determine this application until comments from LU Infrastructure Protection are received. Comments from LU Infrastructure Protection should be considered in conjunction with our comments below.

The site of the development proposal is located less than 100 metres from Hampstead Road (A400) which forms part of the Transport for London Road Network (TLRN). Transport for London is the highway authority for the TLRN and are concerned about any proposal which impacts on the safe and efficient movement of traffic, including buses and also cycles on the carriageway and/or affect the safety and comfort of pedestrians on the footway.

1. The footway and carriageway on the A400 must not be blocked during the removal and construction works. Temporary obstructions must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A400/ Hampstead Road.
2. All vehicles associated with construction must only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions.
3. No skips or construction materials shall be kept on the footway or carriageway on the TLRN at any time. Should the applicant wish to install scaffolding or a hoarding on the footway

whilst undertaking this work, separate licences may be required with TfL, please see, <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/highway-licences>.

4. TfL object to proposals outlined within the DAS, Servicing and Deliveries Option 1 in which the main servicing and delivery access to the site would be off Hampstead Road. This is because the pedestrianised stretch along North Gower Street provides a direct access for the interchange from Euston Station to nearby bus stops on Hampstead Road and so this proposal would create a conflict of use and raise pedestrian and cyclist safety concerns.
5. TfL note proposals to occasionally utilise access from the northern end of North Gower Street. TfL require further details are provided in terms of the safety strategy to be deployed when using this pedestrianised access and crossing over a pedestrian footway. Traffic marshals should be used when accessing the site via this route.
6. Construction vehicles accessing the site via Euston Road should possess the highest Direct Vision Standards (DVS) due to the presence of an unsegregated but well used cycle route and the merging of two major flows of traffic just before turning onto North Gower Street. TfL request clarity on the DVS level the council will expect from construction vehicles.

Further information regarding the DVS can be found here: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>.

7. A full CLP should be secured by condition and discharged in consultation with TfL.

The CMP submitted does not provide sufficient detail for TfL or the Council to properly assess construction impacts at this stage and measures proposed to help prevent or mitigate against these, with many details currently not included. 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.

TfL note many elements have been left with the justification these will be confirmed when the principle contractor is appointed.

TfL request the applicant provides an indicative list, in line with CLP TfL guidance of the measures they expect the contractor to implement and comply with when they are appointed. TfL guidance can be found at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>.

The applicant should confirm that they will comply with CLOCS standards and use freight operators with FORS silver or gold membership, as it is imperative that road safety measures are considered and preventative measures delivered through the construction and operational phases of the development.

TfL requests that accredited Site Access Traffic Marshals are appointed to carry out the traffic management procedures during construction works. Further information can be

found here: <https://constructionlogistics.org.uk/> or through contacting enquiries@constructionlogistics.org.uk.

All construction deliveries should ideally be scheduled outside the TLRN peak hours.

Due to the application site's proximity to the TLRN, during clearance and construction TfL will insist that:

- No vehicles are parked on Hampstead Road (A400) at any time, whether carriageway or footway.
 - No deliveries or site clearance vehicles to be parked on Hampstead Road at any time.
 - Any crane erection or removal is carried out from within the site or from borough roads, not Hampstead Road.
 - Over sailing of cranes on Hampstead Road is not permitted.
 - During demolition, great care must be taken to ensure that no debris or dust ends up on the footway or carriageway of Hampstead Road.
 - Any vehicles exiting site should pass through a wheel wash if using High Road.
 - A 24 hour point of contact should be provided to TfL.
8. TfL note proposals to suspend parking bays on Starcross Street to aid with larger vehicles accessing the site as well as implementing a holding area off site for delivery vehicles associated with construction. The council and applicant should note that Starcross Street footways provide a key link from the site to Euston Station and so amenity levels in line with Pedestrian Comfort Guidance must be maintained. This TfL guidance can be found here: <http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>.

No loading/ unloading should be carried out on the TLRN and if on street, TfL expect pedestrian safety to be ensured through appropriate measures.

9. TfL note predicted trip generation and mode share figures provided in Table 3.3 which have been calculated using TRICS comparisons for a University/ College in Hillingdon, outer London and a community centre in Cambourne, Cambridgeshire. The applicant should verify trip generation assumptions against the assumed number of staff, students and visitors in the form of a Daily User Profile for the site to ensure predictions are representative of the site.

Based on current mode split predictions provided, travel plan targets set out in Table 4.1 are too low.

On opening, after a baseline assessment has been carried out, if mode share splits are lower than predicted, the travel plan should set out to reach these higher mode share levels.

10. In order to conform to the draft London Plan Policy the development should provide the following quantum of cycle parking:

Use Class	Long-Stay	Short-Stay
B1 Office	35	5
CSC	9	19
Multi-use hall	1	4
TOTAL	45	28

Current proposals fall below these minimum standards outlined in Policy T5 (cycling), Table 10.2 with a short fall of 2 long-stay and 6 short-stay spaces. The applicant should increase this provision to comply with the figures provided above.

11. As per Draft London Plan Policy AA, Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS.) The LCDS can be found in TfL's online Streets Toolkit at:
<https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>.

Chapter 8 specifically covers cycle parking and the standards outlined within this chapter will be used to assess this proposal's cycle parking.

Cycle parking should be:

- **Fit-for-purpose** – meeting identified current and future demand, with an appropriate balance of short stay and longer-stay provision, and accommodating all types of cycle.
- **Secure** – stands in secure private or indoor spaces, or in visible, well-lit places that have high levels of natural surveillance.
- **Well-located** – convenient, accessible, as close as possible to the destination, and preferably sheltered.

For TfL to assess this provision further against the LCDS, the applicant should produce a Parking Design and Management Plan providing details of the proposed long-stay cycle parking for the three uses proposed. This should cover the general convenience and safety, aisle widths between all cycle racks, the different rack types proposed (e.g. any double stacked), 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.

Camden LPA should assess current on street Blue Badge parking provision in the vicinity of the site and decide whether this will sufficiently cater for the demand created by this proposal.

Overall, TfL advises the Council not to determine this application until comments from LU Infrastructure Protection are received and that the applicant has had the chance to respond to those comments.

TfL Spatial Planning requires further information as outlined above prior to being supportive of this application.