

# Transport for London



Our Ref: CMDN/19/285

Your Ref: 2019/4201/P

Transport for London  
City Planning

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Sent by email to [planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
21 October 2019

Dear Camden Planning,

**St Pancras Commercial Centre, 63 Pratt Street, Camden , London**  
**TfL consultation comments**

Thank you for consulting TfL on this planning application.

*The following comments are made by Transport for London officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.*

As stated [on our website](#), the amount of detail in our advice always depends on the quality of information you give us initially.

In this case we have considered:

- Transport Assessment
- Delivery and Servicing Plan
- Construction Environment Management Plan
- Planning Statement
- Proposed Ground Floor Plan
- Proposed Site Plan

**MAYOR OF LONDON**



VAT number 756 2769 90

- Design and Access Statement

Our subsequent advice below should enable you to understand all of the major transport issues and requirements we have identified and recommend at this stage.

**Site context**

The site has a PTAL of 6a on a scale of 0 to 6b. It is approximately 500m east of Camden Town London Underground (LU) station and 1.5km north-west of St Pancras / King's Cross LU and National Rail station. Camden Road station is approximately 250m north, served by London Overground.

The site is surrounded by St Pancras Way to the east, Pratt Street to the south, Royal College Street to the west and Georgiana Street to the north. Royal College Street is a key cycle route between Kings Cross and Camden, with a segregated two way cycle tracks implemented by Camden Council. The nearest part of the Transport for London Road network (TLRN) is Camden Street A400 approximately 120m west along Georgiana Street.

The nearest bus stops within walking distance are on Royal College Street, Bayham Street, and Plender Street, enabling access to the 274, C2, 46, 31, 24, 134, 29, 88, 27, 168, 253 and 214 services. The closest Cycle Hire docking station is at St Martins Close, Camden Town approximately 150m north.

**Development proposal**

The application proposes to demolish the existing light industrial buildings and car parking and create a new mixed use development including 3 new buildings with an interconnected shared basement covering the majority of the site.

The new development proposed includes office floorspace (Class B1) in a seven storey building with an internal servicing access street colonnaded through the ground floor and three new flexible retail units (A1/A3) at the ground and basement levels. 32 new residential units (Class C3) are also proposed in two separate five and six storey buildings, which would be market and affordable housing respectively. A light industrial unit (Class B1c/B8) is proposed in the ground floor of the affordable block.

The development proposal also includes new access, public realm, landscaping, cycle parking, disabled car parking, and refuse facilities to support the new land uses and buildings proposed. The application's Transport Assessment (TA) is a new Healthy Streets TA. It carefully follows the latest TfL guidance for planning applicants, which is very welcome.

**Transport context**

The site has a PTAL of 6a on a scale of 0 to 6b. It is approximately 500m east of Camden Town station and 1.5km north-west of St Pancras / King's Cross station. Camden Road station is approximately 250m north, served by London Overground.

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#### **Site and surroundings**

##### Walking

Pedestrians will access the site via fully accessible entrances on Royal College Street to the west for the office building, and Georgiana Street to the north for both the residential blocks. This will separate them from the servicing access points, and existing on-street parking bays on St Pancras Way to the east. A new publicly accessible east-west walking route is also proposed between Royal College Street and St Pancras Way.

##### Cycling

Cyclists will access the office building will using a dedicated entrance on Pratt Street to the south, leading into a basement cycle parking area. Each residential block will have its own basement cycle parking area, both with shared access through the main entrance lobbies. The site benefits from excellent cycling accessibility due to the high quality segregated cycle route immediately next to it on Royal College Street.

##### Public Transport

The nearest bus stops are also very nearby; 40m south of the site on Royal College Street and 180m west on Camden Street. Prior to determination, these bus stops should be checked for step free accessibility in accordance with TfL's Accessible Bus Stop Design Guidance. If any kerbs need to be raised or other improvements are required to ensure that disabled people can board buses at those stops, the applicant should provide funding via Section 106 (S106) or a Section 278 (S278) agreement with the Council for highway works Royal College Street.

A 50% increase in footfall is expected due to the new development. In response it will leave a minimum footway width of at least 4m on Royal College Street along the busiest pedestrian route at the eastern site boundary, which is very welcome.

Given the location and car-lite nature of the proposals, the TA is strongly active travel focused with transport connectivity and capacity impacts mitigated mainly on site and in the nearby surrounding area, which is supported.

#### Public Realm

An independent Stage 1 Road Safety Audit (RSA) has been provided for the new servicing vehicle access proposed onto St Pancras Way to the west, which is welcome. This has been shared with TfL's safety engineers and TfL will provide detailed comments to the applicant and Council prior to determination.

However TfL's safety engineers have confirmed that the RSA authors do not meet the minimum requirements set out in Catalogue of National Qualifications SQA-0170 as both the Audit Team Leader and Member need to be in the Society of Road Safety Auditors.

The RSA's statement that its overall objectives and structure follow TfL standards is not correct. TfL does not accept RSAs which follow the Highways Agency UK Design Manual for Roads and Bridges (DMRB) 'GG119 Road Safety Audit' document published in November 2018 for the Transport for London Road Network (TLRN).

The RSA submitted also does not follow the usual RSA report writing convention, as the majority of problems discussed do not appear to pose a road safety risk. Some appear to be design checks, comments or just general observations.

The internal public realm seems sensibly designed in transport terms, and likely to deliver improvements against the Healthy Streets indicators in accordance with draft London Plan policy T2 (Healthy Streets). Walking and cycling journeys to key active travel destinations in the local area have also been assessed against the Healthy Streets indicators with photographic evidence in the Active Travel Zone (ATZ) assessment of the application's Healthy Streets TA, which is discussed further below.

#### Servicing

The application proposes to maintain an existing vehicle access into the site off Pratt Street as an entry-only point and provide a new exit point out onto St Pancras Way. This will create a one-way (northbound) servicing access, which will pass through the largest building, the southern residential block, at ground floor level, and create an colonnaded servicing street with direct internal access to the three new flexible retail units, and access into the light industrial unit in the base of the north eastern affordable residential block from an on-street bay in the internal public realm courtyard.

Advantageously, the proposed arrangement will keep servicing vehicles away from the pedestrian and cyclist entrances. The colonnaded internal servicing street will also include a dedicated loading area outside each retail unit and vehicles moving through it will be able to pass ones already making deliveries.

The servicing arrangement proposed is acceptable in principle. Sufficient loading is proposed for the residential, light industrial and flexible retail uses. The outline Delivery and Servicing Plan (DSP) makes clear how efficient and safe deliveries have been strongly encouraged through the development's design and will continue to be encouraged through management measures once the development is occupied. All

delivery and servicing vehicles will arrive and leave the site in forward gear with no reversing on or off the public highway.

It is positive that the proposed development will enable occupiers of the light industrial and flexible retail units to receive and sometimes send out deliveries, but almost completely separately from the residential outdoor amenity areas and access points. This represents a reasonable and balanced approach to meeting the multi-modal access needs of the mixed use development proposed.

#### Cycle parking

A minimum of 308 long-stay and 58 short-stay cycle parking spaces are proposed, in accordance with the minimum standards in draft London Plan Policy T6 and Table 10.2. This amount of cycle parking should be secured by condition. The short-stay cycle parking spaces are proposed in three locations in the public realm all of which are acceptable in principle, especially for visitors to the residential blocks adjacent to the main entrances on Georgiana Street.

The office block cycle parking will be accessed from the dedicated cycling entrance on Pratt Street, via either stairs with a cycle channel or a lift. Showers, lockers and changing facilities for staff will also be provided, at a minimum of 2 lockers per 3 long-stay spaces and 1 shower per 10 long-stay spaces. This should also be secured by condition.

Each residential block has its own independent cycle parking basement area, also accessed via stairs or a lift.

Whilst the amount and locations of cycle parking proposed are acceptable in principle, clarification is sought on the detailed design to ensure compliance with the London Cycling Design Standards (LCDS).

Specifically the applicant should provide scaled detailed design drawings of all cycle parking areas prior to determination, for further assessment by TfL. We seek to confirm:

- Exactly how many long and short-stay cycle parking spaces will be provided for larger bikes such as cargo bikes and adapted ones used by disabled people, and where those spaces will be located
- The proportion of cycle parking proposed on two-tier racks, since many people can't use them even if they are power-assisted or have gas-lift
- Aisle widths between the cycle stands (at least 2.5m clear space must be provided in front of the lowered top tier of any two-tier cycle racks).
- Internal dimensions and capacity for all lifts (how many cyclists can use each lift with a bike at the same time)
- Gradients and widths for all stairs and cycling channels proposed to be used for accessing basement cycle parking areas

- Confirmation cyclists will have to pass through no more than two sets of doors to access any cycle parking area on site, and how the doors will be motorised.

#### Car parking

The development will be car-free except for three disabled car parking spaces; two proposed at the kerb-side on Georgiana Street to the north for the residential blocks and one on Pratt Street to the south for the office block. This complies with the maximum car parking standards in London Plan Policy 6.13 and Table 6.2, and draft London Plan Policy T6 and Tables 10.3, 10.4 and 10.5.

Three existing on-street car parking spaces and a motorcycle parking bay on St Pancras Way, both pay and display, will be retained, although new planting providing Sustainable Urban Drainage (SuDS) benefits will be introduced between the motorcycle and car parking areas.

This existing on-street car and motorcycle parking may be needed to accommodate vehicle overspill from the light industrial and flexible retail uses, depending on their final character. It could also potentially be converted to become cycle parking, more green landscaping, or on-street Blue Badge car parking in future.

As a result on balance retaining it is acceptable. However, a Car Park Design and Management Plan should be secured by condition, in accordance with draft London Plan policy T6, and discharged in consultation with TfL.

#### **Active Travel Zone (ATZ)**

An ATZ Assessment has been provided. The key local active travel destinations and routes it identifies are acceptable. Its conclusions about the availability and quality of key local active travel routes are broadly correct.

However, as raised by TfL at pre-application stage, the local ATZ lacks green space, which is identified as a key active travel destination in TfL's new Healthy Streets TA guidance. The applicant was therefore requested to assess walking and cycling journeys to the nearest point of access onto Regents Canal towpath as part of the ATZ Assessment (see Location A2 in the Healthy Streets TA).

This has revealed that the canal towpath entrance from the bridge across the canal at the junction between Georgiana Street and St Pancras Way is not wheelchair accessible. It is also very difficult for cyclists to use due to steep steps. The applicant should therefore propose improvements to this access onto the canalside towpath, which should be funded in full or in part by the proposed development via S106, to ensure compliance with draft London Plan policies T2 (Healthy Streets) and D7 (Public realm).

The towpath represents the closest pleasant green space to the development site, just 100m walk away. As a result this would clearly directly benefit new residents and other users of the proposed development.

The use of 'Desirable', 'Acceptable' and 'Preferred Maximum' walking distances (Figure 4.8) to assess the ATZ key destinations is not supported and should be removed. TfL's new ATZ methodology has been designed to assess and encourage active travel to key destinations at any distance within a 20 minute cycle range, provided the destinations are essential to a car-free lifestyle. Setting arbitrary distance thresholds for the attractiveness of walking journeys is not appropriate as part of an ATZ Assessment, which should instead assume that people will walk or cycle longer distances to key local destinations if they do not own or use a private vehicle, and the relevant active travel routes are genuinely pleasant and safe.

We don't ask for every photograph in every journey corridor to be scored against all of the Healthy Streets indicators numerically, just one in each. So the analysis of the photographs in the ATZ Assessment is far too long and complex in this instance.

Step 7 of the ATZ Assessment guidance says "For only the worst part of each journey (i.e. most unpleasant or potentially unsafe for people on the street...)" and Step 8 "... write 8 statements 3 sentences long, on why the area shown in your photo doesn't meet each of Healthy Streets indicators 3-10 and how this could be improved.

The [TfL Guide to the Healthy Streets indicators](#) includes reasons and improvement ideas for all indicators. You can also contribute your own ideas. Follow this format: 'Healthy Streets indicator not met, why? How to improve...'. For example: The area in Photograph 5 isn't 'Not too noisy' [indicator] because [why] people have to raise their voice to hold a conversation. [How to improve?...] This could be improved by low noise road surfacing."

This process has been designed to find the best opportunities for small-scale street improvements, and to limit the volume of material that needs to be scored and assessed by both transport consultants and public officers.

The ATZ Assessment submitted is similar in length and complexity to a Pedestrian Environment Review Survey (PERS), which TfL no longer endorses. Please bear this in mind for the future on other applications in London.

Finally, for my own curiosity, please clarify what an 'Appropriate food outlet' means (Figure 4.8).

#### **London-wide network**

##### Trip Generation

The trip generation analysis needs to be updated prior to determination to fix a number of methodological issues. The comparison sites used to generate trip rates include large offices in Wembley, Hayes and Isleworth, all of which seem unlikely to be similar in transport character to Camden and should therefore be removed. Due to their inclusion, the trip rate seems likely to have underestimated public transport use because more people drive more car parking is available in those less central London areas.

The LU and rail demand generated by the new development needs to be split by line and direction to properly assess the impact of this site's additional demand on the LU network. TfL is also concerned that Camden Town may not have sufficient gate-line capacity and internal circulation space to cope with these additional passengers during peak periods. 2 hour peaks periods should be used, from 8-10am and 5-7pm, rather than 8-9am and 5-6pm only. It is unclear in the TA if Overground and TfL Rail services are included in the 'Rail' figures. We will be happy to advise further on improving this assessment.

#### Mitigating capacity impacts

Based on the scale of development proposed and the expected number of LU trips likely to be generated, financial contributions may be sought toward mitigating the site specific impact of the development on Camden Town LU station. Our involvement in planning obligations in London follows [relevant national regulations](#).

#### **Construction**

An Outline Construction Management Plan (CMP) has been provided which is acceptable in principle. A full Construction Logistics Plan (CLP) ideally in [TfL's recommended format](#) should be secured by condition and discharged prior to commencement of construction.

#### **Community Infrastructure Levy**

Mayoral CIL at a rate of £80 per sq m will be due from the development and should be secured in the planning decision.

#### **Summary**

As explained here, the following strategic transport issues need further attention and in some cases planning obligations:

- Further discussion with TfL on the Road Safety Audit for the proposed servicing egress
- Bus stops on Royal College Street need step free accessibility in accordance with TfL's Accessible Bus Stop Design Guidance
- Drawings to confirm the detailed design of all cycle parking will meet London Cycling Design Standards (LCDS)
- Car Park Design and Management Plan secured by pre-occupation condition
- Improving disabled/cycling access onto Regents Canal from the junction between Georgiana Street and St Pancras Way, 100m east of the site
- Trip Generation needs updating to robustly clarify Bus / LU / Overground network capacity and gate-line impacts
- A full TfL CLP secured by pre-commencement condition
- Mayoral CIL at a rate of £80 per sq m



TfL will welcome further involvement and discussions in order to ensure agreement on as many issues as possible before the application is determined.

Should you wish to discuss any of this letter further, please contact me.

Gavin McLaughlin

