



Transport for London

16/10/2019

To: Patrick Marfleet – London Borough of Camden

From: Jack Kinder - TfL

Our Ref: CMDN/19/295

Your Ref: : 2019/3091/P

Green Comments – Conisbee Transport Consultant

Blue Comments – FBM Architects

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

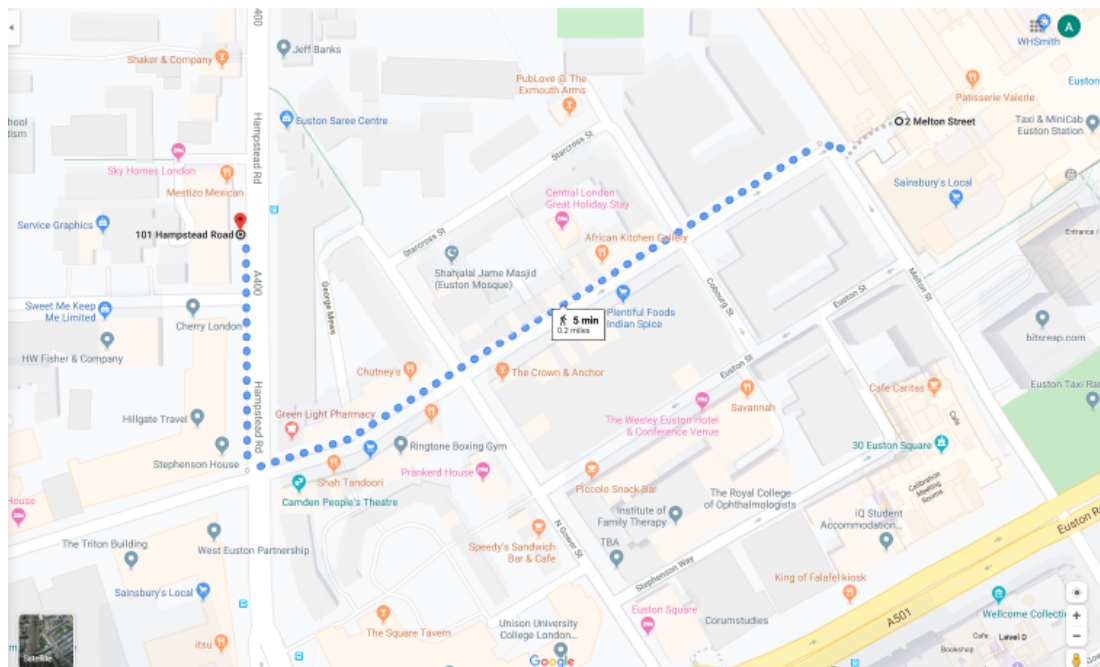
whilst undertaking this work, separate licences may be required with TfL, please see, <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/highway-licences>.

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.

***Conisbee-** Pedestrian flows on North Gower Street have been observed during site visits as very low. No cyclists have been observed using the northern end of North Gower Street on site visits. The anticipated number of deliveries is also very low. It should be noted that there is an existing vehicle access from the site on to the northern end. The status of this section of street has not been established (a request has been issued to Camden) but vehicle use appears to be allowed and it appears to act as a shared surface rather than a pedestrianised street. Given the low flows, width and forward visibility on the route, it is not anticipated that there will be a conflict of use or that this use for deliveries will be a highway safety issue.*

***FBM-** The road is not fully pedestrianised – it's a shared surface with vehicle access still available from the south, up to the gate across the road at the northern end. It is used for emergency access to both the adjacent flats and the former school buildings.*

In addition, its worth noting that map software such as google maps directs you to the bus stop(s) on North Gower Street along Drummond Street and not Starcross Street – as below screenshot.



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.

Conisbee - As stated above, this appears to be a shared surface route, and there is an existing vehicle access from the site. Number of delivery vehicles will be low as well as low pedestrian flow and it is considered that occasional vehicle use of this shared street does not compromise safety.

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 TLNRN peak hours.

Due to the application site's proximity to the TLNRN, 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.

FBM- We fully understand and accept that a CMP will be required and a planning condition included in the decision notice. At this later stage, a contractor will be on board allowing a detailed and expert proposal based on known information and programme to both demolish and construct. It is not a large project compared to the size of site it occupies. Currently, we have provided all the known information and approach that both the applicant and local community wish to see – with access from Hampstead Road.

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.

Conisbee - Given the level of existing pedestrian use of Starcross Street and the number of additional pedestrian movements associated with the development, it is considered that there is unlikely to be pedestrian crowding of the footway and pedestrian comfort levels will be unchanged.

FBM – It is a very quiet and secondary street with little pedestrian movement. Undertaking any additional surveys is excessive.

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.

Conisbee - The original predictions are based on person trips per area. A mode share appropriate to the site was then applied to these person trip predictions. We have carried out a Daily User Profile for University/College use and compared the results based on floor area with predictions based on number of students, staff and visitors (including tutors). The table below shows the results.

	<i>Arrivals based on floor area</i>	<i>Arrivals based on number of staff and students</i>	<i>Departures based on floor area</i>	<i>Departures based on number of staff and students</i>	<i>Total based on floor area</i>	<i>Total based on number of staff and students</i>	<i>Difference between per area calculations and per staff/student calculations</i>
<i>7:00-8:00</i>	<i>15</i>	<i>13</i>	<i>1</i>	<i>1</i>	<i>16</i>	<i>15</i>	<i>+1</i>
<i>8:00-9:00</i>	<i>128</i>	<i>115</i>	<i>3</i>	<i>2</i>	<i>130</i>	<i>118</i>	<i>+12</i>
<i>9:00-10:00</i>	<i>38</i>	<i>34</i>	<i>8</i>	<i>7</i>	<i>46</i>	<i>42</i>	<i>+4</i>
<i>10:00-11:00</i>	<i>31</i>	<i>28</i>	<i>7</i>	<i>6</i>	<i>38</i>	<i>34</i>	<i>+4</i>
<i>11:00-12:00</i>	<i>18</i>	<i>17</i>	<i>20</i>	<i>18</i>	<i>38</i>	<i>34</i>	<i>+4</i>
<i>12:00-13:00</i>	<i>20</i>	<i>18</i>	<i>29</i>	<i>26</i>	<i>49</i>	<i>44</i>	<i>+5</i>
<i>13:00-14:00</i>	<i>8</i>	<i>7</i>	<i>14</i>	<i>13</i>	<i>22</i>	<i>20</i>	<i>+2</i>
<i>14:00-15:00</i>	<i>16</i>	<i>15</i>	<i>34</i>	<i>30</i>	<i>50</i>	<i>45</i>	<i>+5</i>
<i>15:00-16:00</i>	<i>5</i>	<i>4</i>	<i>45</i>	<i>41</i>	<i>50</i>	<i>45</i>	<i>+5</i>
<i>16:00-17:00</i>	<i>1</i>	<i>1</i>	<i>73</i>	<i>65</i>	<i>74</i>	<i>67</i>	<i>+7</i>
<i>17:00-18:00</i>	<i>0</i>	<i>0</i>	<i>26</i>	<i>23</i>	<i>26</i>	<i>23</i>	<i>+3</i>
<i>18:00-19:00</i>	<i>0</i>	<i>0</i>	<i>12</i>	<i>11</i>	<i>12</i>	<i>11</i>	<i>+1</i>
<i>19:00-20:00</i>	<i>1</i>	<i>1</i>	<i>12</i>	<i>11</i>	<i>13</i>	<i>12</i>	<i>+1</i>
<i>20:00-21:00</i>	<i>2</i>	<i>2</i>	<i>4</i>	<i>4</i>	<i>6</i>	<i>6</i>	<i>0</i>
<i>21:00-22:00</i>	<i>0</i>	<i>0</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>0</i>
<i>Total</i>					<i>572</i>	<i>516</i>	<i>+56</i>

It can be seen from the table above, that calculations based on the floor area are more robust and result in higher number of trips when compared to the number of staff and students.

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

The data is based on 2011 Census Journey to Work data with a high proportion of travel by public transport. This tends to be determined by home location and it is difficult to promote a mode change to work and cycle for those live some distance from the development. It should be noted that the car use is already minimal in this area and therefore measures will be aimed at ensuring sustainable modes including walking, cycling and using public transport are attractive choices and easy and convenient. The Travel Plan is based on Travel to Work data and once the development is occupied, surveys will be carried out. Based on these more appropriate targets will be set and the Travel Plan reviewed and if required adjusted. This will submitted to Camden for approval along with measures to achieve these targets.

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.

As stated above and in the Travel Plan (see para 3.7.3 and 4.2.3 of the Travel Plan) the actual mode split will only be known once the initial (baseline) travel surveys have been carried out. The targets will be updated with the results of the initial (baseline) travel surveys.

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.

Conisbee - Camden's Highways Officer stated that the development needed to meet the current policy, however, given that this is a small increase in parking numbers, it is possible to increase the cycle parking to meet the draft policy.

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.

FBM – We will increase cycle parking to the Draft Standards which are above the Current Standards. Cycle spaces are shown on the plans (landscape masterplan - 0143_100_Landscape masterplan_E) but to expand upon, we have allowed for;

- Sheffield Type stands throughout at 1000mm centres*
- They are covered and illuminated. They are secured if for use as Long Stay parking.*
- They have been discussed with Secured by Design who will require a condition to be included in the permission. They are in generally support of the location and passive and active safety measures being proposed for this development.*

We have plenty of space in the scheme to provide good quality cycle provision and are happy to accept a condition to demonstrate full technical details at a suitable stage when we know which company and brand of shelter and stand will be purchased along with approval from SBD officers.

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.