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25th November 2019

Dear Kate,

St Pancras Commercial Centre – Supplementary Transport Assessment Note

This is a supplementary response that has been prepared following comments/questions received from Tatai Dewes (Camden Highways) and Gavin McLoughlin (TfL).

Sections A-J address comments from Camden; sections 1-7 address comments from TfL.

Camden comments

Comments were received from Tatai Dewes via email on 5th November 2019 and letter on 19th November 2019 (letter dated 7th November 2019). A copy of these responses are included as Appendix A to this note.

A - PCE Contribution

Gerald Eve are currently reviewing the requested PCE contribution sum. We will liaise with the Camden highways officer regarding potential improvements the contribution could be used for – including the Georgiana Street / St Pancras Way junction and canal tow path linkage improvements. *[This responds to TfL comment #4]*

B - Building line on Georgiana Street

We can confirm that the building line on Georgiana St has been pulled back by between 630mm to 750mm.

C - Title Plan

We understand that a title plan for the site has been / will be supplied to you by Blackburn.

D1 - Residential cycle parking

The proposed residential quantums have been corrected based on 33, not 32, units. The additional unit is in the market apartment block building.

	Market		Affordable		Total	
	Units	Parking	Units	Parking	Units	Parking
Studio	0	0	0	0	0	0
1B1P	0	0	0	0	0	0
1B2P	7	11	4	6	11	17
2B+	12	24	10	20	22	44
Total	18	35	14	26	33	61

Table 1 Residential provision and long-stay cycle parking requirements

The total long-stay parking requirement is therefore:

- Market apartment block building = 35 spaces; and
- Affordable apartment block building = 26 spaces.

The cycle stores in each residential block will be specified with sufficient provision based on the numbers above. *[See also Camden comment #G]*

D2 - Long-stay cycle parking (retail)

Long stay cycle parking provision is proposed to be located in the individual retail units (back of house). The location/arrangement of this parking is to be determined by each tenant during fit out.

E - Non-standard cycle provision

The requirement for non-standard cycle parking is noted – see comment G below.

F - Long-stay cycle parking (light industry)

As with the retail use, long stay cycle parking provision is proposed to be located in the individual light industrial units. This avoids the need for: (a) providing an additional basement level cycle store (separate from the office use); and (b) having multiple separate tenants accessing this separate cycle store.

The location/arrangement of this parking is to be determined by each tenant during fit out.

G - Detailed design of long-stay cycle parking

Additional information regarding the detailed design of cycle parking has being prepared by the scheme architects. Plans of the office and two residential cycle stores are included at the

end of this note (as Appendix B). We propose that the detailed sign-off of long-stay cycle parking provision is dealt with via a planning condition.

H - Road Safety Audit

Our response to the queries regarding the Road Safety Audit is included against TfL comment #2.

I - Pratt Street build out

The potential introduction of a cycle scheme on Pratt Street is noted. Given the uncertainty regarding when this scheme's detailed designed will be progressed and then consulted on, it is proposed that the current development proposals are retained. This can be re-assessed in due course post-determination.

J - Gate proposals

A drawing of the gate proposals [477_CSJ_C1_ZZ_DE_A_7006_S1_P02] was submitted as part of the planning application. The proposed specification is a bespoke motorised concertina shutter that folds into a recess in the building elevation. A shutter will be provided at each end of the 'internal' street.

TfL Comments

Comments were received from Gavin McLoughlin on 21st October 2019. A copy is included as Appendix C to this note.

1 - Bus stops

Using TfL guidance, we have reviewed the nearest two bus stops for their current accessibility. The stops are:

- Royal College Street – 45m south of the development; and
- Camden Road – 160m west of the development.

Camden Road

The bus stop serves Route 46 (southbound). The advertised service headway is every 8-12 minutes, equivalent to a frequency of 5-8 buses per hour. Camden Road is a wide two-lane carriageway, southbound only.

Kerb lining at the bus stop is double red which meets TfL guidance.

The measured kerb height is in the range 110mm to 120mm which meets TfL guidance.

The footway surrounding the bus stop is generously proportioned with sufficient space for ramp deployment, passenger waiting and pass-by walking activity.

Example audit photographs are provided overleaf.

Figure 1 Camden Road bus stop

Figure 2 Camden Road bus stop footway

No improvements are required to this stop.

Royal College Street

The bus stop serves Route 46 (northbound). The advertised service headway is every 8-12 minutes, equivalent to a frequency of 5-8 buses per hour. Royal College Street has a wide one-lane carriageway, northbound only and on-street cycle lanes in both directions.

Kerb lining is thick yellow as per TSRGD 1025.1 which meets TfL guidance.

The measured kerb height in the range 70mm to 75mm (see Figure 3) which does not meet TfL guidance.

A review of the footway surrounding the bus stop gives a footway clear width to the rear of the bus shelter of c.1300mm (see Figure 4). Bus passenger access/egress and ramp deployment takes place directly across the northbound cycle lane (see annotated Figure 5).

Figure 3 Royal College St bus stop kerb height

Figure 4 Royal College St footway width

Figure 5 Royal College Street bus stop ramp deployment (shaded red)

The incorporation of the northbound cycle lane between the edge of carriageway and the bus shelter is believed to date back to c.2000[1]and pre-dates the 2013 cycle scheme on the street.

It is understood that the original consultation plans for the treatment of the cycle lane as it passed the bus stop included a 'very severe ramp'[2]. The as-constructed ramp is gentler – hence the lower kerb height.

Given that the originally proposed design by Camden Council for this bus stop was specifically amended to incorporate a reduced kerb height it is inappropriate to make any further changes as part of this development.

2 - Road Safety Audit

Further information is awaited from TfL regarding the Stage 1 Road Safety Audit. In the initial TfL response several wider points raised regarding the audit/auditors:

- Paul Matthews is an Associate Member of SoRSA; Ajay Patel is currently applying for SoRSA membership having recently completed the 10-day RoSPA Road Safety Engineering course;
- The RSA report specifically states that it "**generally** follows the guidance in recently published UK Design Manual for Roads and Bridges (DMRB) 'GG119 Road Safety Audit' document" [my emphasis]; and
- In your letter it is stated that "the majority of problems discussed do not appear to pose a road safety risk". The auditors' view is that the problems as discussed in the report could lead to road safety hazards if not rectified.

Camden comment #H requested clarification on whether a Stage 2 Road Safety Audit had been undertaken. The scheme's RIBA Stage 3 design is due to complete at the end of January 2020. Before the completion of this stage of design a follow-up Stage 2 Road Safety Audit will be undertaken with sufficient time for any recommendations to be included/incorporated. However, at the time of writing (November 2019) it is premature to undertake this Stage 2 Road Safety Audit.

[1] https://camdencyclists.org.uk/2013/09/royal-college-street-cycle-track/

[2] https://camdencyclists.org.uk/2013/09/royal-college-street-cycle-track/ [17 August 2013 footnotes]

3 - Cycle parking

Additional information regarding the detailed design of cycle parking has being prepared by the scheme architects. Plans of the office and two residential cycle stores are included at the end of this note. *[See also LBC comments E and G]*

4 - Canal towpath access

Camden Council's response to the planning application included the requirement for a Pedestrian, Cycling and Environment (PCE) Contribution. The contribution will be focussed on improving cycling and walking routes, including possible improvements between the site and the canal towpath access. *[See also LBC comment A]*

5 - Walking distances / ATZ

We are aware that the use of desirable, acceptable and preferred maximum distances are no longer supported by TfL. However, the Transport Assessment was assessed for BREEAM compliance and some specific section (using this wording) was required in order for the document to meet the necessary criteria. The BREEAM compliance requirements has also led to the odd sounding 'appropriate food outlet' wording.

6 - Trip Generation

The sites selected for office trip generation were based on the following criteria in TRICS:

- Multi-modal surveys only
- 2014 onwards
- London only
- Town centre and/or edge of town centre locations
- In the range 5,000-25,000m^2 (the site is c.17,000m^2)
- This led to four sites being selected as per Table 7.1 of the Transport Assessment

The extracted TRICS trip rates are for **people trips** – ie all modes of travel to/from the surveyed site. From this we have then applied census-derived mode shares that are specific to Camden. The headline public transport (tube, rail, bus) mode share that we have used in our analysis is 84%, consistent with very high levels of expected public transport use. We believe that this approach will estimate suitably robust estimates of PT usage.

7 - PT demand

We have undertaken additional analysis of public transport demand using information in the Transport Assessment supplemented by TfL station entry/exit flow data and census journey to work data.

Tube/Rail split

Census Journey to Work data [*WU03EW, E02000184: Camden 019: 2011 super output area - middle layer*] was used as a proxy for likely trip distributions for journeys to/from the development. The headline mode shares from this dataset are:

- Tube = 31%
- Train = 27%
- Bus = 12%
- Total PT = 70%

The Transport Assessment (TA) used mode shares derived from a wider Camden area that had higher PT shares:

- Tube = 39%
- Train = 32%
- Bus = 13%
- Total PT = 84% [Table 7.3]

As such, the TA can be seen to be using robust assumptions for likely public transport usage.

The census mode share data is based on journeys taken in 2011 – where the following caveats apply:

- compared to the present day, 2011 journeys took place on an old public transport network with different services, routes, awareness and branding (especially London Overground / TfL Rail); and
- there are biases present in how census respondents identified different modes of travel (notably tube, rail) as their main mode.

A degree of caution is needed therefore in terms of the reported tube/tail share. The 'raw' share from the extracted census data is: 53% tube and 47% rail.

Based on a more detailed analysis of the top 30 journey origins/destinations (at a Borough-level) and public transport choices available for the present day, a revised share is: 61% tube and 39% rail. Compared to the aggregated data above, this represents a robust assumption for likely tube use.

Station usage

Based on direction of travel and availability of tube/rail services, the likely station of choice was assessed for the top 30 origins/destinations.

For journeys to/from locations in central and southern London there is a choice between using Camden Town and Mornington Crescent stations (noting Charing Cross Branch only). Likely station usage is based on:

- 7 min walk to Camden Town + station access time + c. 2 min journey time; or
- 10 min walk to Mornington Crescent + station access time

In peak periods it is reasonable to expect that the use of Mornington Crescent would be as attractive as Camden Town due to a shorter journey time (one less stop) and a shorter station access time due to less congestion. Therefore, it is assumed that:

- 1/3 of journeys on the northern line (to/from the south) will use Mornington Crescent;
- 2/3 of journeys (to/from the south) will use Camden Town;
- ¼ of journeys on the northern line (to/from the north) will use Mornington Crescent; and
- ¾ of journeys (to/from the north) will use Camden Town.

Based on these assumptions, the overall station patronage split is as follows:

Service / Direction	% of tube + rail demand	Notes
Camden Road East	25.7%	
Camden Road West	6.6%	
St Pancras North (rail)	1.6%	Walk to St Pancras – tube access accounted for in Camden Town total
St Pancras South (rail)	5.4%	
Camden LU North	9.2%	
Camden LU South	12.1%	
Mornington Crescent North	3.1%	
Mornington Crescent South	36.4%	

Table 2 Station usage shares

Tube/rail flows

Total development demand has been taken from Table 7.28 of the TA, reproduced below as Table 3.

	AM			PM			All-day (06-21)		
Mode	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
Tube	123	13	136	10	123	133	475	480	954
Rail	99	7	106	6	99	105	361	366	727
Total	222	20	242	16	222	238	836	846	1671

Table 3 Total development generated flows by mode, time period, direction

Applying the station splits above from Table 2 gives overall station access/egress flows by time period.

	AM			PM			All-day (06-21)		
Station	**In**	**Out**	**Total**	**In**	**Out**	**Total**	**In**	**Out**	**Total**
C Road	71	6	78	5	71	77	269	272	542
C Town	92	8	100	7	92	99	347	351	698
M Cres	43	4	46	3	43	46	161	162	323

Table 4 Total development generated flows by mode, time period, direction

Additional station entry/exit flows are in the order of one to two additional people per minute for each of the stations, consistent with the TA summary (section 12.4).

Station entry/exit flows

Station entry/exit flow data has been sourced from TfL[3] with Monday-Thursday average flows for 2018 used.

	AM			PM			All-day (06-21)		
Station	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**
C Road	1659	612	2271	691	1486	2177	9991	9082	19073
C Town	2509	1437	3946	2384	3598	5982	27437	24957	52394
M Cres	1314	327	1641	369	1636	2005	6530	6954	13484

Table 5 Existing station entry/exit flows

[3] http://crowding.data.tfl.gov.uk/

The development generated flows (Table 4) represent a small percentage increase on existing flows (Table 5):

	AM			PM			All-day (06-21)		
Station	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**
C Road	4.3%	1.1%	3.4%	0.7%	4.8%	3.5%	2.7%	3.0%	2.8%
C Town	3.7%	0.6%	2.5%	0.3%	2.6%	1.7%	1.3%	1.4%	1.3%
M Cres	3.2%	1.2%	2.8%	0.8%	2.6%	2.3%	2.5%	2.3%	2.4%

Table 6 Percentage increase in station flows due to proposed development

Based on existing gate line capacity (Camden Town = 10; Camden Road = 6; Mornington Crescent =4; all excluding wide aisle gates) the development-generated increase in station entry/exit flows is very modest. This increased station demand is shown in Table 7 – expressed as an additional 1 person per gate every X minutes:

	AM			PM			All-day (06-21)		
Station	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**	**Exit**	**Entry**	**Total**
C Road	3	19	5	23	3	5	10	10	10
C Town	5	22	6	36	4	6	13	13	13
M Cres	4	16	5	20	4	5	11	11	11

Table 7 Increase in gate line activity due to proposed development (1 person per gate every X minutes)

It can be seen that there would be, on average, an uplift in station activity in the order of an additional 1 person per gate every 3 minutes (Camden Road) to 4 minutes (Camden Town and Mornington Crescent). This magnitude of increase is very modest and sufficiently small to not warrant specific, additional mitigation.

We believe that these clarifications (subject to further discussion regarding the PCE contribution and TfL Road Safety Audit comments) are sufficient for you and LB Camden / TfL colleagues to confirm that the proposed scheme is acceptable on highways grounds.

I would be very happy to discuss any of this further with you if required.

Regards,

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