

# Appendix A

LB Camden comments

## Simon Adams

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**From:** Alex Neal <ANeal@geraldeve.com>  
**Sent:** 05 November 2019 13:39  
**To:** Simon Adams; 'Sascha Lewin'; Simon Leathem; Richard Hitch (richard@blackburnltd.com); Peter St John; Rod Heyes; James Hand (jhand@carusostjohn.com)  
**Cc:** Lisa Webb; Sam Avis  
**Subject:** FW: SPCC - transport comments  
**Attachments:** image013.png; image014.png; image015.png; image016.jpg

Simon et al

Please see below informal comments from the Highways Officer with points that require addressing and further information.

On the Pedestrian, Cycling and Environment Contribution (PCE), we will investigate how this sits against other recent schemes in Camden.

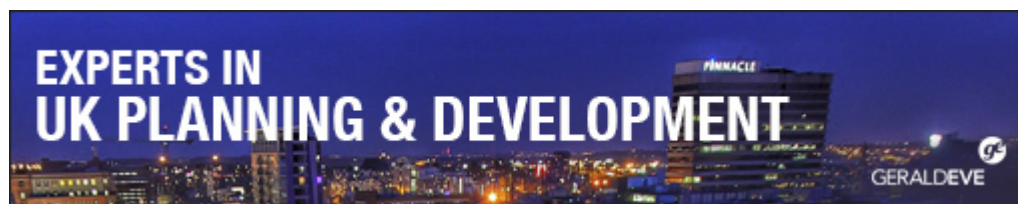
Regards  
Alex

**Alex Neal**  
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**GERALDEVE**



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**From:** Dewes, Tatai <Tatai.Dewes@camden.gov.uk>  
**Sent:** 05 November 2019 12:21  
**To:** Alex Neal <ANeal@geraldeve.com>; Henry, Kate <Kate.Henry@camden.gov.uk>  
**Cc:** Sam Avis <SAvis@geraldeve.com>  
**Subject:** SPCC - transport comments

Hi Alex

Please see comments below. I'll be submitting my formal comments to Kate this afternoon, but the below is a heads up of things that need addressing and further information required.

## 1. Highways Contribution

As I'm sure you can appreciate, there will be substantial highway works required (footway realignment and repaving) to implement the proposed new layout of the public highway. Adding to this, the extent of the demolition, excavation and construction is likely to lead to damage to the footways and carriageway which will need to be repaired.

A breakdown of the Highway Contribution:

- Footway to be constructed: 1125sqm
- Carriageway to be resurfaced: 1430sqm
- Crossing to be constructed, this includes the two disabled bays on Pratt and Georgiana St and 2 x vehicle entrances: 110sqm
- Granite kerbs: 390m

Other items which have been included are:

- TMP cost
- Tree and stump removals
- Relocation of 3 signs and posts
- Relocation of 9 bollards
- Relocation of 2 gullies
- Relocation of 4 lamp columns
- Installation of sinusoidal cushion
- Removal of 16m of guard railings

The estimate does not include any consultation fees and installation of any proposed trees.

## 2. Pedestrian, Cycling and Environment Contribution (PCE)

This contribution is based on the uplift of office, residential and retail. These uses will result in a very significant increase in trips to/from the site, and the PCE contribution will be used by the Council to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. The contribution would most likely be focussed towards improving cycling and walking routes, thereby helping to encourage residents, staff and visitors to walk and cycle. There is potential to improve the junction of Georgiana Street-St Pancras Way while there is also a proposal for a cycle lane on St Pancras Way.

## 3. Section 38 (Highways Act)

The building line on Georgiana Street is proposed to be pulled back by 0.7m. Can you please confirm this is correct? This is welcomed, as will increase the footway width and allow for the inset Disabled Bays associated with the residential development. The footway/parking realignment proposed on St Pancras Way results in the new footway being pushed back into the site. The council would repave these areas along with the remaining footway, and adopt these sections as public highway.

I need to run this by our highways department, but can't see it being an issue.

Can you also provide a title plan for the site?

## 4. Long Stay Cycle Parking

The proposal would provide 17,072sqm of office space, 892sqm of retail, 3519sqm of light industrial and 33 residential dwellings.

The proposal is required to provide the following long stay cycle parking provision to meet the draft London Plan standards:

- Residential – 61 spaces (26 affordable and 35 market)
- Office B1 – 228 spaces
- Light industrial – 15 spaces
- Retail – 5 spaces

Four comments relation to the long stay cycle parking.

- a. The level of provision proposed does not meet the minimum requirement of the draft London Plan for residential and retail uses. The proposed provision falls two short of the residential requirement (currently at 59), and there are no retail spaces provided. The shortfall in residential spaces may be due to the revised plans increasing the number of resi unit from 32 to 33. The extra spaces need to be accommodated, as are the retail spaces.
- b. The council also expects that there is a provision for non-standard cycles. The Transport Assessment confirms that 5% of spaces will be configured to accommodate non-standard cycle designs including those for users with mobility impairments. These spaces should be outlined in the detailed plans, discussed below.
- c. The 15 spaces required as part of the Light Industrial use are proposed to be either located in with the B1 office use or within the Light Industrial units themselves. The cycle provision for the different uses needs to be separate, as these uses/buildings will be under separate use and management.
- d. More information is also required on the type of stands and the detailed design/layout of the cycle parking stores to assess if the design meets the requirements set out in CPG Transport and TfL's cycle parking guidance (LCDS). These plans need to be to scale, and include the distance between each stand, the widths of isles between stands and between stands and walls. The dimensions of the lifts (door and lift width, length) should also be given or shown on the plans.

I recommend submitting detailed plans for each cycle store, as opposed to a ground floor plan for the whole site.

#### **5. Road Safety Audit**

The initial RSA that was submitted (attached to the TA) recommends that a Stage 2 RSA is carried out when detailed design of the scheme is complete. Has this been commissioned? I see TfL have commented on the RSA, and requested a RSA is carried out to their standards/guidance. Has this been done?

#### **6. Vehicles entrance on Pratt Street**

The newly aligned vehicle entrance to the service road on Pratt Street involves the removal of a tree, and the proposed relocation (or introduction of a new tree) is shown in a footway buildout. This buildout is unlikely to be possible, as there is a cycle scheme proposed for Pratt Street which would effectively narrow the available carriageway width. I realise the final public highway design is still subject to detailed design by the council, however its worth flagging this now in case it has implications for the proposed tree layout.

#### **7. Gated entry to service road**

The entrance to the service road is proposed to be gated. Can you provide a plan and/or more of the gates, such as the direction they open or if it is sliding gate.

Let me know if you have any questions about the above.

Regards

Tatai Dewes  
Principal Transport Planner

Telephone: 020 7974 3062



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**From:** Alex Neal <[ANeal@geraldeve.com](mailto:ANeal@geraldeve.com)>

**Sent:** 04 November 2019 10:58

**To:** Henry, Kate <[Kate.Henry@camden.gov.uk](mailto:Kate.Henry@camden.gov.uk)>; Dewes, Tatai <[Tatai.Dewes@camden.gov.uk](mailto:Tatai.Dewes@camden.gov.uk)>

**Cc:** Sam Aviss <[SAviss@geraldeve.com](mailto:SAviss@geraldeve.com)>  
**Subject:** RE: SPCC - transport contributions

Sorry I also should have added whether you had any specific comments as well as the contributions.

Regards

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**From:** Alex Neal  
**Sent:** 04 November 2019 09:35  
**To:** Henry, Kate <[Kate.Henry@camden.gov.uk](mailto:Kate.Henry@camden.gov.uk)>; Dewes, Tatai <[Tatai.Dewes@camden.gov.uk](mailto:Tatai.Dewes@camden.gov.uk)>  
**Cc:** Sam Aviss <[SAviss@geraldeve.com](mailto:SAviss@geraldeve.com)>  
**Subject:** RE: SPCC - transport contributions

Hi Tatai

Please can you provide a breakdown for the Highways and Pedestrian, Cycling and Environment contributions?

Kind regards  
Alex

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**GERALDEVE**



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**From:** Henry, Kate <[Kate.Henry@camden.gov.uk](mailto:Kate.Henry@camden.gov.uk)>  
**Sent:** 01 November 2019 13:23  
**To:** Alex Neal <[ANeal@geraldeve.com](mailto:ANeal@geraldeve.com)>  
**Cc:** Sam Aviss <[SAviss@geraldeve.com](mailto:SAviss@geraldeve.com)>  
**Subject:** SPCC - transport contributions

Hi,

As discussed with Alex, please find below the suggested Transport related contributions for the above.

- Construction Management Plan implementation support contribution - £22,816
- Travel Plan Monitoring and Measures Financial Contribution for B1 office - £9,618
- Agreement In Principle - £1800 per elevation (relates to excavation in close proximity to the highways, to be confirmed by Shane Greig)
- Highways Contribution - £249,753.60
- Pedestrian, Cycling and Environment contribution - £460,000

I am yet to add the cost of the short cycle parking that is proposed on the public highway, but it won't add a lot to the total.

Kind regards

Kate Henry  
Senior Planning Officer  
Regeneration and Planning  
London Borough of Camden  
(Tue, Wed, Thu, Fri)

Telephone: 020 7974 3794

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<b>To:</b>	Kate Henry
<b>From:</b>	Tatai Dewes
<b>Date:</b>	7 <sup>th</sup> November 2019
<b>Re:</b>	St Pancras Commercial Centre 63 Pratt Street London NW1 0BY
<b>Proposal:</b>	Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3), flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works
<b>Reference:</b>	2019/4201/P
<b>Key points:</b>	Recommended for approval subject to

### **Introduction**

The site is located on between St Pancras Way, Georgiana Street, Royal College Street and Pratt Street and is easily accessible by public transport with a PTAL rating of 6a (very good). The nearest transport interchange is Camden Town Station (underground) which is located approximately 550m to the east of the site. In addition, bus stops serving various routes are located nearby on Royal College Street and Camden Street.

The existing site is made up of 3,389m<sup>2</sup> of light industrial, while also featuring space for approximately 60 vehicles to park within the site.

The development proposes the following land uses:

- 3,519m<sup>2</sup> (GEA) light industrial;
- 17,072m<sup>2</sup> (GEA) office;
- 829m<sup>2</sup> (GEA) retail; and
- 32 residential units made up of 11 x 1bed and 22 x 2bed

### **Cycle parking**

#### *Long Stay*

The proposal would provide 17,072sqm of office space, 892sqm of retail, 3519sqm of light industrial and 33 residential dwellings.

The proposal is required to provide the following long stay cycle parking provision to meet the draft London Plan standards:

- Residential – 61 spaces (26 for affordable units and 35 for market units)



- Office B1 – 228 spaces
- Light industrial – 15 spaces
- Retail – 5 spaces

The council also expects that there is a provision for non-standard cycles. The Transport Assessment confirms that 5% of spaces will be configured to accommodate non-standard cycle designs including those for users with mobility impairments. These spaces should be outlined in the detailed plans, discussed below.

**The level of provision proposed does not meet the minimum requirement of the draft London Plan for residential and retail uses.** The proposed provision falls two short of the residential requirement, and there are no retail spaces provided. The 15 spaces required as part of the Light Industrial use are proposed to be either located in with the B1 office use or within the Light Industrial units themselves. The cycle provision for the different uses needs to be separate, as these uses/buildings will be under separate use and management.

More information is also required on the type of stands and the detailed design/layout of the cycle parking stores to assess if the design meets the requirements set out in CPG Transport and TfL's cycle parking guidance (LCDS). These plans need to be to scale, and include the distance between each stand, the widths of isles between stands and between stands and walls. The dimensions of the lifts (door and lift width, length) should also be given or shown on the plans.

The Transport Assessment confirms 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.

The provision and ongoing retention of the cycle parking and associated facilities would be secured by condition if planning permission is granted.

#### *Short Stay*

The development is required to provide a minimum of 58 short stay spaces in accordance with the draft London Plan. There are 28 spaces provided for in two locations within the site, and a further 30 spaces are proposed on the public highway on Georgiana Street. These spaces on the public realm are acceptable in principle, however will be subject to final detailed design of the public highway. The cost for the implementation of short stay cycle spaces are provided for within the Pedestrian, Cycling and Environment contribution.

#### **Trip generation**

The submitted Transport Assessment (TA) includes details of trip generation analysis from the use of TRICS and TRAVL trip generation software for all uses, while a comparison is also made with the existing trips generated by the light industrial use.

#### *Office*

The results predict the proposed office development would generate 2233 2-way

trips per day. The assessment also predicts 328 trips (309 in, 18 out) in the AM peak and 328 trips (17 in, 328 out) in the PM peak.

The assessment suggests the following modal share:

- 8% walking
- 6% cycling
- 84% by public transport
  - 35% Underground
  - 29% Rail
  - 12% Bus
- 2% motorcycles

The results of the assessment suggest that the proposed B1 development will result in large increase in the number of trips to the site. The majority of these trips is likely to be via public transport, however the Council anticipates that a higher modal share for cycling and walking can be achieved via a travel plan and the implementation of public realm improvements in the local area to make cycling and walking more attractive to residents, staff and visitors.

#### *Residential*

The residential trips generated by the 33 new dwellings would not have significant effect on the transport network, with an estimated 16 2-way trips in the AM peak and 10 2-way trips in the PM peak. Due to the car free nature of the residential development, it is likely the vast majority of the trips will be done by sustainable modes of transport.

#### *Retail*

The retail floor space of the development is split between three locations across the site, with sites measuring 250sqm, 144sqm and 435sqm. It is anticipated that the three sites will be operated separately, due to their different locations across the site.

The overall trip rates for the three retail sites was estimate using the TRICS and TRAVL trip generation tools. Comparable sites from the two databases were used to estimate the number of trips based on the floor space of retail use. The total trips for all three sites are:

- 187 two way trips in the AM peak
- 391 two way trips in the PM peak
- 3898 two way trips across the whole day (6am-9pm)

The total amount of estimated trips associated with retail use is significant, however by the nature of the uses and location it can be assumed that the majority of these trips will be generated locally, either originating from the other uses on the site, from other sites within the area and by those passing by the site on linked trips.

The applicant has applied a factor of 25% to be taken from the estimated total trip numbers above, to estimate the number of new trips to the area generated by the retail uses. This represents the trips which are not associated with the uses

proposed on the site or trips generated by other sites within the area. This factor gives more realistic trip rate estimates of:

- 47 two way trips in the AM peak
- 94 two way trips in the PM peak
- 974 two way trips across the whole day (6am-9pm)

#### *Light Industrial*

A survey was carried out at the existing site, and compared to estimated trip rates provided by TRICS for the proposed site. The existing site survey showed that there were 81 trips in the AM peak, 40 in the PM peak and 775 across the day (6am-9pm), which translates to 84, 41 and 803 trips respectively when the uplift of ~130sqm in light industrial use is applied.

The TRICS database does not have any comparable sites within London, and therefore the analysis used similar sites from across the country. The analysis estimated a much lower trip rate than the existing site, with trip estimates of:

- 32 in the AM peak
- 22 in the PM peak
- 389 in total across the day

It is likely that with the removal of the excess parking spaces within the site, and the formalisation of the servicing operations via the new servicing road, the trip rate will be less than the existing rates as the availability of commuter parking employees will be removed.

#### *Summary of combined trips for all uses*

The combined estimated trips for the proposed development for all modes has been calculated to be:

- 423 two way trips in the AM peak
- 458 two way trips in the PM peak
- 3709 two way trips across the whole day (6am-9pm)

The total estimated trips to and from the site are summarised by land use in the table below:

	Total all-day two-way trips	% (rounded) by land use
Office	2233	60%
Light Industrial	389	10%
Residential	112	3%
Retail	974	26%
Total	3709	100%

Approximately 6% (circa 200) of the total number of trips will be by motor vehicle, the vast majority (circa 180) of which are goods vehicles associated with the light industrial, office and retail use across the whole day.

### **Travel planning**

As detailed in the previous section, there is a large amount of predicted trips associated with the development, the majority of these associated with the office use. A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport.

A strategic workplace travel plan (for the B1 office) and associated monitoring and measures contribution of £9,618 will be secured as a section 106 planning obligation if planning permission were granted. The Travel Plan would be targeted towards the office use, to encourage staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips.

A combined Local Level Travel Plan and associated monitoring and measures contribution of £4809 should also be secured for the Light Industrial and Retail uses. While it is unclear what the final make up of these units will be, a Travel Plan managed by the Estate Management should be secured in order to ensure that the staff for these uses are encouraged to travel sustainably.

### **Car parking**

The development will be secured as car free, restricting occupiers from obtaining residents and business parking permits. Disabled Bays will be provided for the residential development on the public highway on Georgiana Street, while there is another proposed on Pratt Street for the B1 Office use. The locations of these bays are acceptable in principle, but will be subject to detailed design and consultation.

The proposed development would involve the use of a servicing road for vehicles servicing the office, light industrial and retail uses. This is acceptable from a general parking point of view, as the shared servicing road will not be used for private parking and only used to service the site in accordance with Policy T2. The servicing road is discussed further in the Servicing section below.

A car-free planning obligation would be secured by legal agreement in accordance with Policy T2 if planning permission were granted. This would apply to all proposed uses (Policy T2 requires all new development in the borough to be car-free).

### **Deliveries and other servicing activities**

There are currently 60 spaces within the site which are used for both loading/unloading and parking. The development proposes to remove the parking space within the site, and introduce a (largely covered) servicing street which runs under the office building, from Pratt Street through to St Pancras Way. The entrance to the servicing street will be gated at both ends, and the gates closed outside of the hours of operation.

The layout of the servicing street enables vehicles to be able to enter and leave the site in forward gear. The width of the servicing street also enables vehicles to load/unload outside of the light industrial units while providing adequate space for vehicles to move past stationary loading vehicles. There is space within the

designated loading area to accommodate 5 light goods vehicles (LGVs) at any one time, or 4 larger 7m long servicing vehicles, while still allowing for vehicles to move past those loading/unloading along the servicing street.

A delivery and servicing plan has been submitted in support of the planning application, which estimates the completed development would generate an average of 188 deliveries per day, approximately 125 of which are associated with the light industrial use. The remaining are associated with the office and retail use, with very few attributed to residential. All delivery vehicles, refuse and recycling collections associated with the office, light industrial and residential uses are proposed to be accommodated within the servicing street. The remaining smaller deliveries and refuse collection associated with the residential development are estimated to be very low frequency (1-2 per day) and will take place from Georgiana Street.

The servicing related trips should have a negligible impact on the surrounding highway network as long as they are managed effectively. To ensure that deliveries, refuse and recycling collections and other servicing vehicles do not have a severe impact on the area, a servicing management plan will be secured as a section 106 planning obligation if planning permission were granted.

Important point to be added to the Servicing Management Plan:

- The headroom for the servicing street is 4m. All vehicles servicing the site will need to be able to meet this restriction.
- No vehicle servicing the retail, light industrial or office uses of the development are to use the surrounding public highway to load/unload.

### **Highway works contribution**

The carriageway and footway directly adjacent to the site on Camden High Street and Delancey Street is likely to sustain significant damage because of the proposed demolition and construction works. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.

A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to repave the carriageway and footway directly adjacent to the site and repair any other damage to the public highway in the general vicinity of the site. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works has been prepared by the Council's Transport Design Team at a total cost of £249,753.60. This contribution will also provide for the proposed public realm changes on the public highway adjacent to the site discussed above, and will be subject to detailed design and consultation.

### **Pedestrian, cycling and environmental improvements**

The development would introduce a substantial increase in new residential and office related trips to the area. The Council, through its policies and strategies aims to encourage active travel such as walking and cycling as the primary mode

of transport for short journeys within the borough, and is committed to improving cycling and pedestrian routes in the area.

The Council will seek to secure a Pedestrian, Cycling and Environmental (PCE) improvements contribution of £460,000 as a section 106 planning obligation if planning permission is granted. This would be used by the Council alongside contributions secured from other major developments and funding provided by other sources to transform the public realm in the general vicinity of the site for the benefit of cyclists and pedestrians. The contribution would most likely be focussed towards improving cycling and walking routes, thereby helping to encourage residents, staff and visitors to cycle.

As discussed in the cycle parking section above, a proportion of short stay cycle parking spaces required by the development will be provided on the public highway. The Council will investigate and look to implement short stay spaces on the public highway within the vicinity of the site as part of the works associated with PCE contribution.

### **Building line and footway changes**

The proposed plans indicate that the building frontage adjacent to Georgiana Street would be pulled back by approximately 0.7m. This would, along with minor kerb line buildout and realignment, increase the effective footway width along Georgiana Street to an average of 4.5m, with a minimum of 2m at pinch points created by the proposed disabled bays. This allows for the introduction of Disabled Bays and public realm improvements including the introduction of short stay cycle parking and rain gardens.

The footway is also proposed to be realigned along St Pancras Way adjacent to the site. The parking bays along this section will be reprovided in a way that allows for the introduction of rain gardens and trees.

All of the changes proposed to the public highway discussed in this section are subject to detailed design and consultation.

The Council would repave the footway directly adjacent to the site in 'like for like' materials (e.g. artificial stone paving slabs). A Section 38 agreement (Highways Act) between the council and the land owner will be required, as the council will adopt these sections of new footway along Georgiana Street and St Pancras Way as public highway. An informative should be included, stating that the applicant is to enter into a Section 38 agreement with the council.

The vehicle entrance and exit points to the new servicing street requires the introduction of a vehicle exit and crossover on St Pancras Way, and the relocation of the existing vehicle entrance on Pratt Street. The relocation of entrance on Pratt Street appears to involve the relocation of a tree and introduction of a build out in the footway on the north side of Pratt Street to accommodate the tree. This build out is not acceptable as it narrows the carriageway at a location where there is a proposed cycle lane (to be consulted on and undergo detailed design) and parking bays. The proposed remaining carriageway width is not sufficient to accommodate the new proposals.

### **Managing and mitigating the impacts of construction**

Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

A Construction Environment Management Plan (draft CMP) has been submitted in support of the planning application. This includes proposals to introduce a pit lane on Pratt Street during demolition and excavation, and a vehicle entrance to the site from Royal College Street and egress on to St Pancras Way during construction. While the information provided in the draft is useful, the CMP document lacks detail as a principal contractor has yet to be appointed. A more detailed CMP would therefore be required and secured via a Section 106 planning obligation if planning permission is granted.

The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is very important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

The development, if approved, would require significant input from Council officers, local residents and other stakeholders. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during demolition and construction. A CMP implementation support contribution would be secured via a Section 106 planning obligation if planning permission were granted.

### **Excavation in close proximity to the public highway**

The proposal would involve basement excavations in close proximity to the footway directly adjacent to the site. We have to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. The applicant would be required to submit Approval In Principle (AIP) reports to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. This is a requirement of British Standard BD2/12. The AIP reports would need to include structural details and calculations to demonstrate that the proposed development would not affect the stability of the public highway adjacent to the site. The AIP would also need to include an explanation of any mitigation measures which might be required.

It is likely that at least four separate AIP reports will be required for the final completed basement, however there is a possibility that further AIP reports will also be required for any temporary piling or retaining walls during excavation and construction. The AIP reports and an associated assessment fee of £1,800 (per report) would need to be secured as section 106 planning obligations if planning permission is granted. It is advised that the applicant and the construction contractor liaise with the councils Structure Manager to determine the number of reports required.

**Issues still to be resolved before application can be recommended for approval**

1. Further information and detailed plans are required for the cycle parking, detailed below:
  - a. The level of provision proposed does not meet the minimum requirement of the draft London Plan for residential and retail uses. The proposed provision falls two short of the residential requirement (currently at 59). The shortfall in residential spaces may be due to the revised plans increasing the number of residential units from 32 to 33. The extra spaces need to be accommodated, as are the retail spaces.
  - b. There are no retail spaces provided. These need to be provided and detailed in the plans.
  - c. The council also expects that there is a provision for non-standard cycles. The Transport Assessment confirms that 5% of spaces in the office cycle store will be configured to accommodate non-standard cycle designs including those for users with mobility impairments. These spaces should be outlined in the detailed plans.
  - d. The 15 spaces required as part of the Light Industrial use are proposed to be either located in with the B1 office cycle store or within the Light Industrial units themselves. The cycle provision for the different uses needs to be separate, as these uses/buildings will be under separate use and management. The location of the spaces needs to be shown on the plans.
  - e. More information is required on the type of stands and the detailed design/layout of the cycle parking stores to assess if the design meets the requirements set out in CPG Transport and TfL's cycle parking guidance (LCDS). These plans need to be to scale, and include the distance between each stand, the widths of isles between stands and between stands and walls. The dimensions of the lifts (door and lift width, length) should also be given or shown on the plans.



2. A plan is required to show how the gates function that open onto the Pratt Street end of the service street, to confirm they do not open outwards onto the footway/public highway.
3. Relocation of vehicle entrance on Pratt Street requires the relocation of a tree and a build out in the footway on the north side of Pratt Street to accommodate the tree. This build out is not acceptable as the proposed remaining carriageway width is not sufficient to accommodate the new proposals.

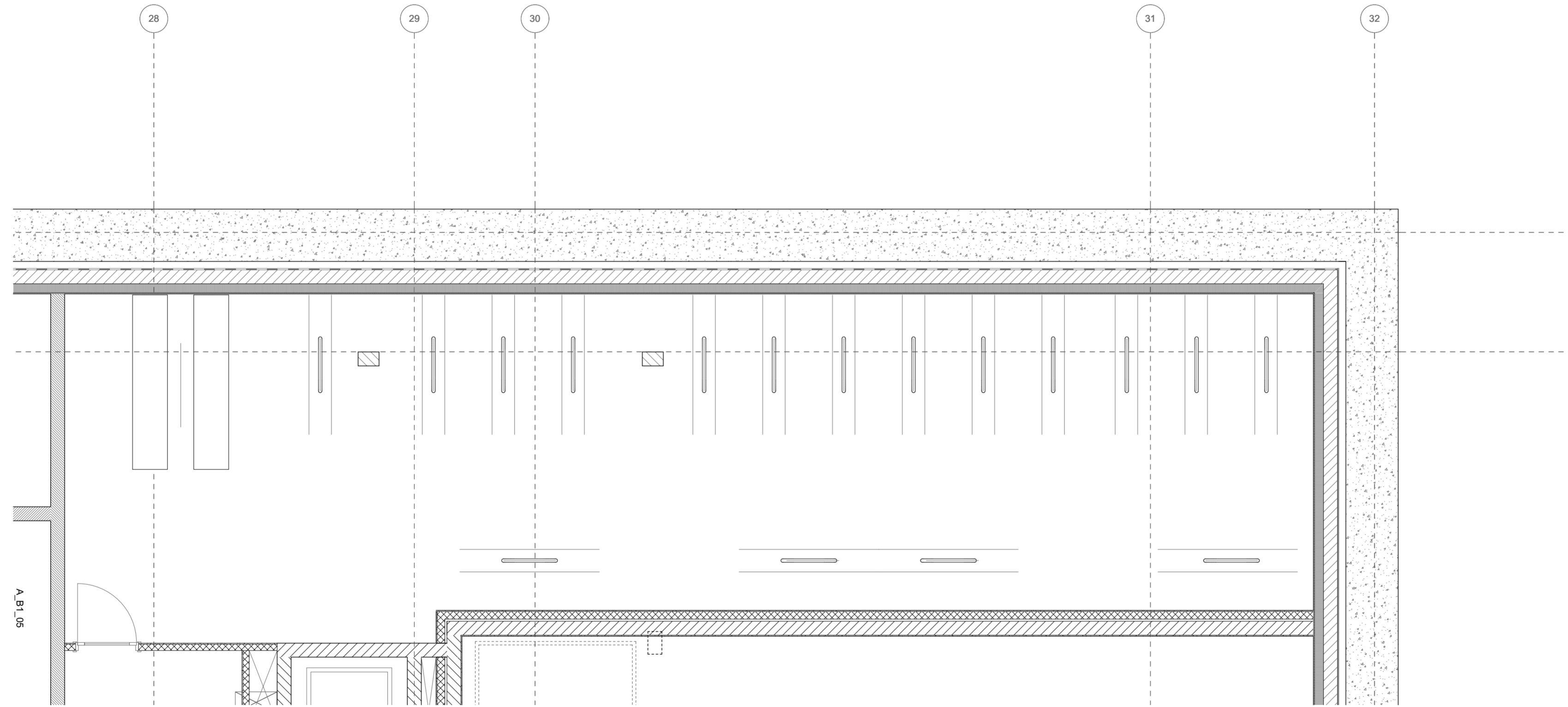
### **Summary and Conclusions**

The proposal would be acceptable in terms of transport if the issues above can be resolved. Any planning approval will be subject to conditions (e.g. cycle parking) and the following planning obligations being secured by legal agreement:

- A condition securing the following provision of CPG Transport compliant long stay cycle spaces:
  - Residential – 61 spaces (26 affordable and 35 market)
  - Office B1 – 228 spaces
  - Light industrial – 15 spaces
  - Retail – 5 spaces
- A condition securing the provision of 28 short stay cycle spaces within the site
- Car-free development applying to all land uses
- Strategic Level Travel plan (for the B1 office use) and associated monitoring and measures contribution of £9,618
- Local Level Travel plan (for the light industrial and retail use) and associated monitoring and measures contribution of £4,809
- Delivery and Servicing Management Plan
- Highways contribution £249,753.60
- Pedestrian, Cycling and Environmental Improvements contribution of £460,000
- Construction management plan (CMP) and CMP implementation support contribution of £22,816
- Approval In Principle (AIP) and associated fee of £1,800 per report
- An informative stating that the landowner will enter into a Section 38 (Highways Act) agreement with the council

## **Appendix B**

### Long-stay cycle parking plans



34 Standard Cycles (26 Required)  
2 Non-Standard Cycles

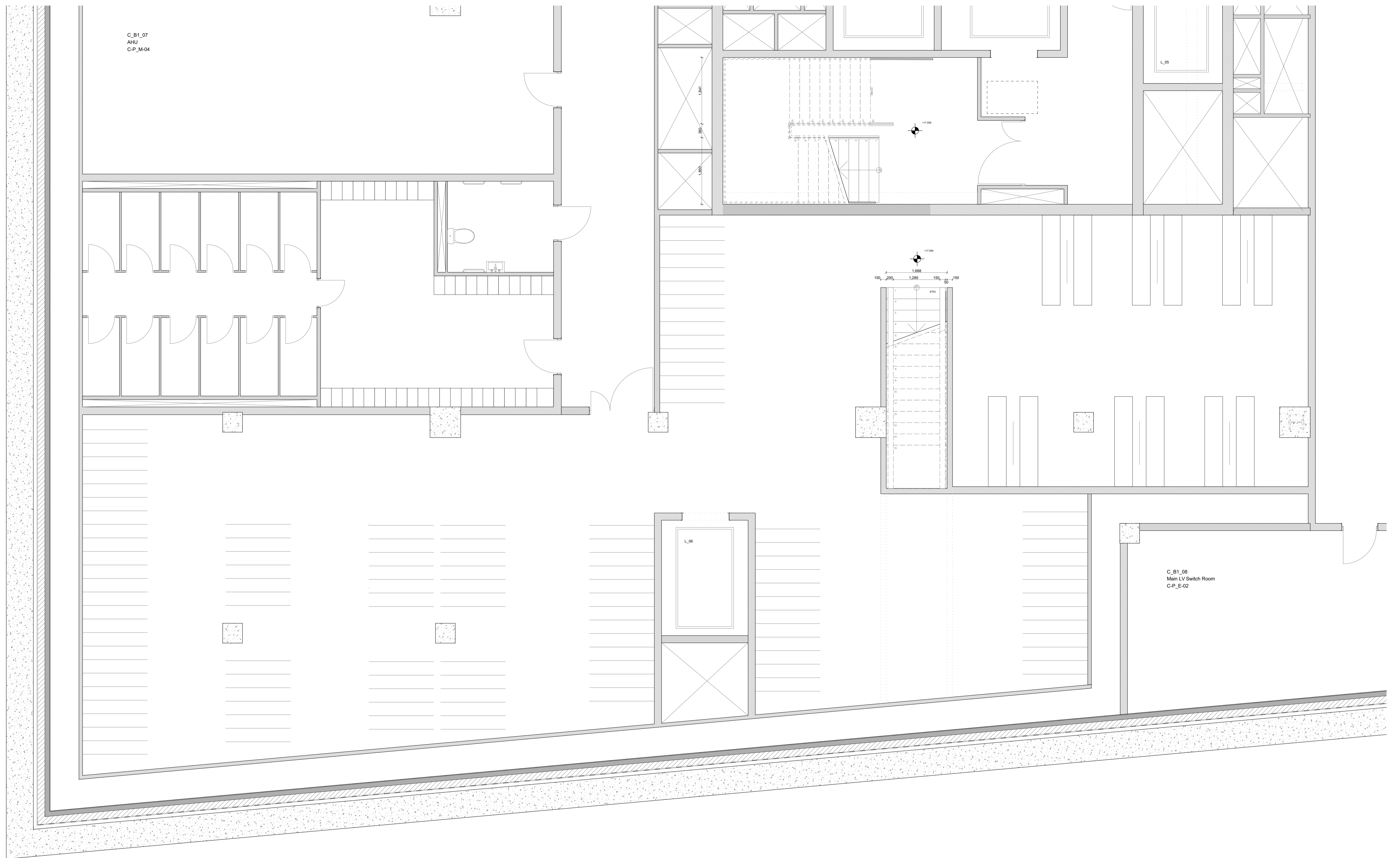
477 St Pancras Commercial Centre

SKETCH - Basement Affordable Plan Cycle Store

477	CSJ	A1	B1	FP	A	080	S1	P01
Project Nr.	Author	Unit	Level	Type	Discipline	Number	Status	Revision

1:50	594 x 420	11/11/2019	11/11/2019	JH	RH
Scale	Size W x H (mm)	Date	Revised	Drawn	Checked

STAGE 03	±0.00 = 0.00 AOD
Project phase	Project datum



C.B1\_07  
AHU  
C-P\_M-04

L\_05

L\_06

C\_B1\_08  
Main LV Switch Room  
C-P\_E-02

Basement Floor Plan

Standard bicycles: 238 two-tier rack spaces  
Non-standard bicycles: 12 spaces

477 St Pancras Commercial Centre

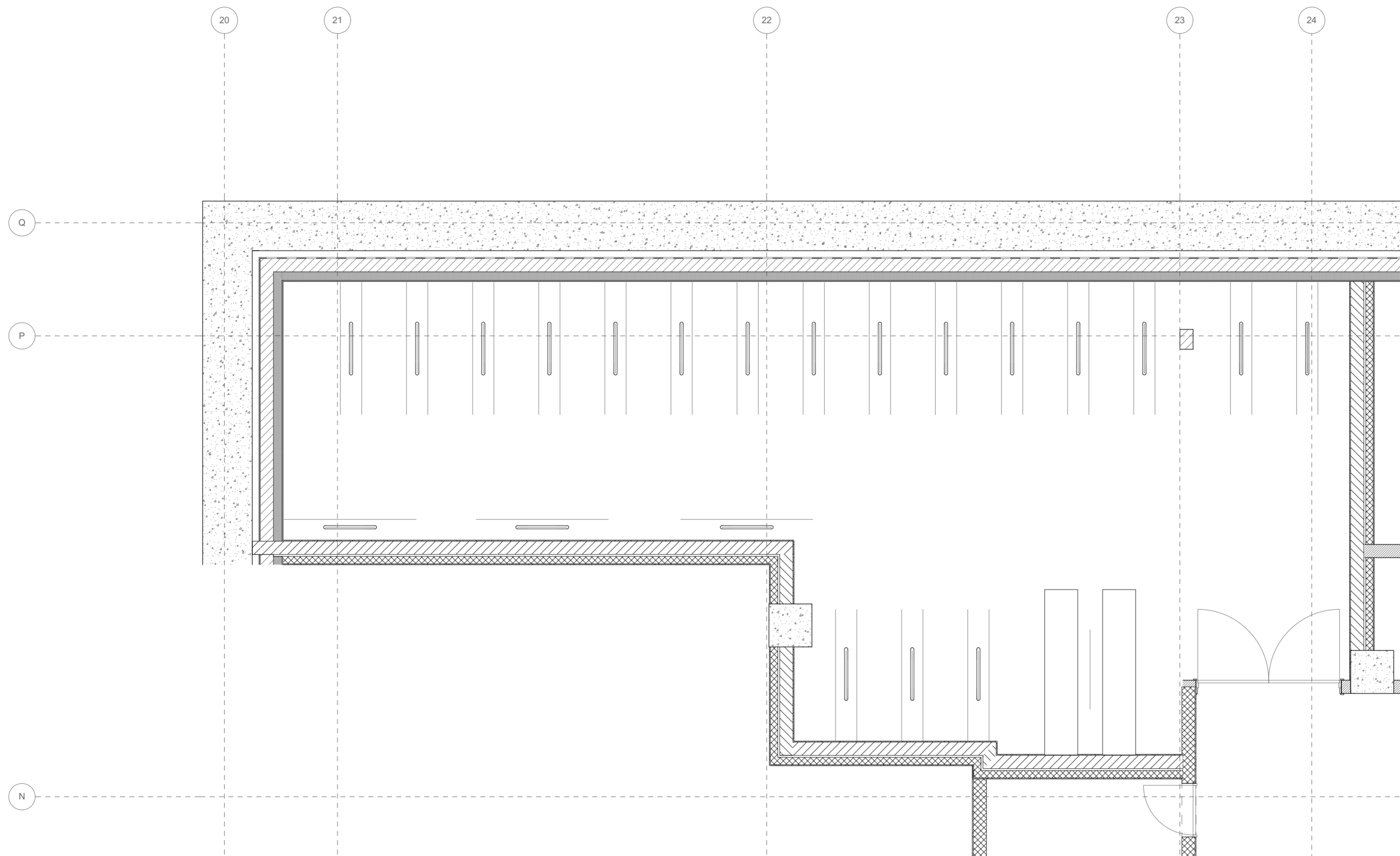
Commercial - Basement floor Plan - Cycle Store

PLANNING

477	CSJ	C1	BF	FP	A	SK050	S1	P01
Project No.	Author	Use	Level	Type	Discipline	Number	Status	Revision

1:50	841 x 594	11.11.2019	11.11.2019	JH	RH
Scale	Size W x H (mm)	Date	Released	Drawn	Checked

STAGE 03	±0.00 = 0.00 AOD
Project phase	Project datum



477 St Pancras Commercial Centre

SKETCH - Basement Market Plan Cycle Store

477	CSJ	M1	B1	FP	A	070	S1	P01
<small>Project Nr.</small>	<small>Author</small>	<small>Unit</small>	<small>Level</small>	<small>Type</small>	<small>Discipline</small>	<small>Number</small>	<small>Status</small>	<small>Revision</small>
1:50	594 x 420	11/11/2019	11/11/2019	JH	RH			
<small>Scale</small>	<small>Size W x H (mm)</small>	<small>Date</small>	<small>Revised</small>	<small>Drawn</small>	<small>Checked</small>			
STAGE 03							±0.00 = 0.00 AOD	

39 Standard Cycles (35 Required)  
2 Non-Standard Cycles

# Appendix C

## TfL comments



Our Ref: CMDN/19/285

Your Ref: 2019/4201/P

Transport for London  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

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

- 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.



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.

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The nearest part of the Transport for London Road network (TLRN) is Camden Street A400 approximately 120m west along Georgiana Street.

### **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

[gavinmclaughlin@tfl.gov.uk](mailto:gavinmclaughlin@tfl.gov.uk)