

Project number:	19170	Project name:	551-557 Finchley Road, Camden
Prepared by:	HLJ		
Subject:	Response to TfL and London Borough of Camden Highways comments		
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1 Response to TfL and Camden Highways comments

1.1.1 Comments have been received from the London Borough of Camden (26th February 2020) and Transport for London (TfL) (3rd March 2020) in relation to the planning application for development at 551-556 Finchley Road. These comments cover the following issues and are addressed in detail in the sections below:

- Vehicle parking;
- Cycle parking;
- Delivery and Servicing Plan;
- Travel Plan;
- Visitors by coach;
- Construction Logistics Plan.

2 Provision of vehicle parking on site

2.1 TfL's comments

TfL welcomes that no general parking would be provided on site; however further investigation is required to confirm demonstrate that existing on-street disabled facility would be appropriate to accommodate demand from the proposal.

2.2 Camden's comments

Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The council will not issue on-street parking permits in connection with new development and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits.

2.3 Response

2.3.1 The site lies in a sustainable location (PTAL 4), and, in accordance with the local and regional policy, it is proposed to provide a car-free development. Census data shows that approximately 90% in the lower super output area (LSOA), use sustainable modes of transport to travel to work. It is, therefore, considered that the majority of staff will travel by sustainable modes to the site. The mode share targets will be established as part of the Travel Plan.

2.3.2 Based on TRAVL and TRICS calculations, it is estimated that the proposed development will generate one vehicle movement in the AM peak and one in the PM peak. It is, therefore, considered that the number of vehicle trips generated by the proposed development and the impact on the existing parking in the area will be negligible.

2.3.3 Given the development provides no on-site parking, the majority of vehicle trips are likely to be either:

- Deliveries;
- Taxi drop-off and pick-up; or,
- Those drivers with a blue badge.

Deliveries

2.3.4 Vehicles can park on the short stay parking bays along Finchley Road.

Taxi drop off

2.3.5 Taxi drop off parking is available at the dedicated parking bays on Finchley Road between 7am-4pm and after 7pm for up to 30 minutes (with a maximum walk distance of 50m). In addition, visitors could be dropped off on Weech Road to the south and Fortune Green Road to the west.

Blue badge parking

2.3.6 There are two zones for disabled parking in the London Borough of Camden – green and blue. The green badge area is at the southern end of Camden, where parking is limited, and the blue badge area covers the area north of the A40/A501, including the site. Blue badge holders can park in the following areas around the site:

- The short stay parking bays on Great North Road immediately to the north of the site frontage (with no time restrictions except between 4pm and 7pm when parking is not allowed).
- The residents' permit holder bays on Weech Road (100m away), Fortune Green Road (120m away), Ardwick Road (110m away) and Platt's Lane (200m away). Visitors with a blue badge can park without time restrictions.
- The blue badge bay on the northern side of Weech Road on approach to Finchley Road junction. Visitors with a blue badge can park without time restrictions.
- Blue badge holders can park on single yellow lines and double yellow lanes as long as there are no loading restrictions for up to 3 hours.

- 2.3.7 It is likely that there will be no more than one or two vehicles parked in the area associated with visitors with a blue badge. Given the availability of parking in the vicinity of the site, it is considered that this small number of additional vehicles can be accommodated without unduly impacting on existing residents' amenity and ability to park.

3 Provision of cycle parking

3.1 TfL's comments

Six on-street Sheffield stands are being proposed in the proposal, TfL considers that that the long stay spaces should be provided within the site. It should also be noted that just under 200sqm of space on site will be used various land use apart from hotel use, therefore cycle parking provision would need to be made for this combined land use in line with the Draft London Plan cycle parking standards. It is incorrect that the Transport Statement has suggested that no provision would be required under the Draft London cycle parking standards.

The applicant shall also identify the possible location for the on-street cycle stands. Shower and changing facilities shall also be provided for hotel staff and users of other business use.

3.2 Camden's comments

The TS claims that three long stay parking spaces and two short-stay spaces are required in accordance with the London Plan and this is accepted. The TS proposes placing six cycle parking spaces (three stands) on the highway fronting the site. However, long stay cycle parking should be covered and secure, and therefore located in the building. Whilst we would not object to the principle of placing short stay parking on the highway, this would require the approval of TfL as Highway Authority.

3.3 Response

- 3.3.1 The required cycle parking provision, based on the New London Plan, is as follows. This assumes that each use (shared co-working space, retail unit and retail shop will be run independently):

- Retail unit (22m²) - falls under the 100m² threshold required for cycle parking provision, no cycle parking is being provided.
- Co-working space/Cafe (183m²) – assumed B1 use, given that majority of floor area will be for co-working. Provision of 3 long stay spaces and 1 short stay is required.
- Aparthotel (33 rooms) – based on C1 hotel use, provision of 2 long stay spaces and 1 short stay.

- 3.3.2 The total requirement is for five long stay spaces and two short stay spaces.

- 3.3.3 It is proposed to provide two short stay spaces (one Sheffield stand) along the site frontage on Finchley Road. The five long stay spaces will be provided internally within the development in a secure storage room on the ground floor. Access to this storage room will be via the reception desk (staffed 24 hours per day).

3.3.4 Changing facilities are provided on the ground floor. With some minor design amendments, it is considered that shower facilities can also be provided. However, it should be noted that the New London Plan states that: *'In places of employment, supporting facilities are recommended, including changing rooms, maintenance facilities, lockers (at least two per three long-stay spaces are recommended) and shower facilities (at least one per ten long-stay spaces is recommended).'* Therefore, the provision of supporting facilities is not a requirement, but a recommendation.

4 Provision of a Delivery and Servicing Plan

4.1 TfL's comments

A Delivery & Servicing Plan (DSP) for the entire site would need to be secured by planning condition, the DSP shall ensure that all servicing will be undertaken at where and during the time permitted by existing on-street stopping/ loading/ waiting restriction. And the bus stop adjacent to the site shall never be used/ obstructed by servicing vehicles at all time.

4.2 Camden's comments

A 33 room hotel will require a large amount of servicing in regard to refuse management and potential laundry requirements. There is no on-site delivery area and whilst there is a loading bay near the site on Finchley Road, it has restricted hours of operation, is available to other vehicles and it is not clear whether the bay has sufficient spare capacity to serve the development site. A draft Delivery and Servicing Management Plan (DSMP) would need to be submitted at application stage and a detailed DSMP would need to be secured via a Section 106 planning obligation if planning permission is granted.

4.2.1 It has been agreed with the Planning Officer that at this stage an outline Plan would be provided. This has been produced by Lime Transport (doc ref: 19170D2a, dated 27th February 2020) and includes information on:

- Delivery and servicing objectives;
- Vehicle generation and types;
- Delivery location and times;
- Plan measures, monitoring and review.

5 Provision of a Travel Plan

5.1 TfL's comments

A Travel Plan Statement for the proposed apart-hotel use shall be produced and be secured by appropriate planning condition/ obligation.

5.2 Response

5.2.1 Camden did not request a Travel Plan. If a Plan is required, this can be set as a condition and provided prior to occupation.

6 Visitors arriving by coach

6.1 TfL's comments

Planning condition shall be imposed to prevent the hotel from accepting coach parties due to lack of coach facilities in the vicinity of the site.

6.2 Response

6.2.1 Camden did not raise this issue. The developer is prepared to accept this condition.

7 Provision of a Construction Management Plan/Construction Logistics Plan

7.1 TfL's comments

A Construction Logistics Plan (CLP) shall be produced in line with the latest TfL's CLP guidance which includes but not limited to details of all construction logistics activities, measures to ensure safety of all road users, location of loading/ unloading, commitment to employ suppliers/ contractors whom have achieved 'Silver' level of the Fleet Operator Recognition Scheme (FORS), and traffic management system ensuring that the bus stop adjacent to the site would not be obstructed at all times. The applicant is also reminded that construction materials/ skips shall not be allowed to be deposited on the footway/ carriageway of A41 Finchley Road at any time.

7.2 Camden's comments

Camden Local Plan policies A1 and T4 state that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). While the scheme is not considered to be a major development, access to the site will be restricted due to it being located on a Red Route. A CMP must be secured as a Section 106 planning obligation if planning permission is granted. A CMP implementation support contribution of £3,136 will also need to be secured as a Section 106 planning obligation if planning permission is granted.

7.3 Response

7.3.1 Camden's Construction Management Plan Pro-forma v2.2. has been completed and submitted as part of the application. This includes information on:

- Working hours;
- Vehicle routes;
- Loading/unloading bays;
- Vehicle types;
- Vehicle swept path analysis;
- Parking suspensions.

7.3.2 A full CLP will be provided prior to occupation.