**TfL Spatial Planning Reference:** CMDN/20/37

**Borough Reference:** 2020/2486/P

**Location:** Land surrounding Snowman House and Casterbridge Belsize Road London

**Proposal:** Construction of a new health and community centre (Use Class D1), relocation of existing residential car park, along with landscaping, associated access, demolition of link bridge between Phases 2 and 3, and cycle parking

Thanks for consulting TfL on this application. Please find our comments below:

**Transport Assessment**

In line with TfL Transport Assessment (TA) threshold guidance (found at: [https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments](https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments#on-this-page-1)) a full Healthy Streets TA is required, following TfL's online guidance for planning applicants.

The Active Travel Zone (ATZ) methodology should be followed to assess key walking and cycling routes in the vicinity of the site. In line with ItP London Plan policies T1, T2 and T4 proposals to enhance local walking and cycling routes for all pedestrians should come forward through this ATZ assessment process. The ATZ map should include an overlay of KSIs (Killed or seriously injured) and for any clusters along key routes in the ATZ assessment, changes must be suggested that would make these routes safer using the Healthy Streets approach.

The trip generation assessment exercise undertaken is not robust, having utilised comparison sites from the TRICS database outside Greater London, some of which over 5 years old. Given the proposals are for the reprovision of existing facilities already nearby, use of trip rates from these existing facilities would have provided a more accurate reflection of the site’s trip generating potential. Despite this, it is considered that the additional trips generated by the scheme are unlikely to have an adverse impact upon the strategic transport network.

**Site Access**

A new vehicle access point from Abbey Road for vehicle parking and refuse collection associated with existing residential uses is proposed. TfL recommends the local highway authority request an independent Road Safety Audit before determining this application and TfL would like to see the audit when completed and any related responses to risks raised by auditor.

The Applicant has been in discussion with Camden Highways and TfL Bus operations regarding the movement of Belsize Road South Hampstead Bus Stop P to facilitate this new access route. TfL advice should be sort on any changes that effect the operation of TfL bus stops. Further discussion with TfL Asset Operations is required in order to agree the final scope of these works. TfL Bus Stop Accessibility Guidance includes advice on the layout of the bus stops and how to ensure bus users can access buses (<http://content.tfl.gov.uk/bus-stop-design-guidance.pdf>.)

The existing vehicle crossover on Belsize Road should be removed and reinstated as footway along the site’s frontage, in line with London Plan policy 6.10 (Walking) and ItP London Plan policy T2.

TfL note proposals to demolish the link bridge between Phases 2 and 3 of the Abbey Road development area. TfL request that alternative crossing facilities are provided at grade on Abbey Road to serve east-west pedestrian desire lines in line with ItP London Plan policies T2 and D8.

**Cycle Parking**

The quantum of long and short-stay cycle parking associated with the community and health centres complies with ItP London Plan policy T5 requirements. It is also welcomed that space for additional cycle parking has been indicated on plans should staff numbers increase. This safeguard should be secured in any permission.

In line with ItP London Plan policy T5 AA, cycle parking should be designed and laid out in accordance with the London Cycling Design Standards (LCDS). TfL will require assurance that externally located long-stay cycle parking complies with the accessibility and security requirements of the LCDS and further details including stand types and dimensions should be provided for assessment.

Short-stay cycle parking is currently proposed adjacent to car parking to the centre of the wider site. This provision should be moved closer to the community uses, prominently located within the public realm.

Shower and changing facilities should be provided for staff that commute to/from the site in accordance with ItP London Plan policy T5 requirements. Maintenance stands and bike pumps should also be provided within each store.

**Car Parking**

Whilst TfL welcome the largely car-free nature of the community uses, TfL note proposals to re-provide 33 car parking spaces currently let to residents as well as an additional blue badge and visitor parking space. In line with policy T6 of the ItP London Plan, given the site’s good to excellent PTAL and location within an Inner London borough, no car parking should be provided except for disabled persons parking.

TfL request further clarity on the usage of leased car parking is provided as well as details on the length of the lease agreements in place. The Applicant and Council are reminded that car parking lease agreements should be separate from the properties themselves and should provide an option for early termination.

The Applicant and Council are reminded of Camden’s sustainable mode share target for 93% of all trips to be made by sustainable modes by 2041.Given the long-term aspirations for mode shift, and the strategic importance of new development in delivering sustainable transport outcomes, we are very concerned that provision of any car parking at this location could embed unsustainable travel patterns and encourage people to travel by car to a location where there are good and improving active travel and public transport alternatives.

Notwithstanding the above, any resultant car parking and vehicular access routes to parking spaces must be designed to avoid creating a car-dominant environment and must not create hazards for vulnerable road users. The needs of people walking, cycling or using public transport should be prioritised over those using vehicular modes and therefore the existing arrangement should be revised to ensure parking is broken up with planting and landscaping, is parallel to the street and continuous footways provided over vehicular access routes in line with ItP London Plan policies T2 and D8. Corner radii should be as small as possible to ensure low vehicular speeds in line with the Mayor’s Vision Zero Objective.

Infrastructure supporting electric or Ultra-Low Emission vehicles should be provided in line with ItP London plan policy T6 requirements.

**Travel Panning**

A framework travel plan has been submitted with the application however it lacks specific quantitative and SMART targets focussed upon increasing the active travel mode share in line with the Mayor’s Transport Strategy mode shift target for Inner London. A travel plan in full should be prepared in line with TfL guidance and secured with any permission.

**Delivery and Servicing and Construction Logistics**

An outline delivery and servicing plan has been submitted with the application. TfL note proposals to provide two delivery and servicing bays on Abbey Road for use of the community and health centres and a blue badge and ambulance bay on Belsize Road. In line with ItP London Plan policy T7 and considering the relatively low quantum of servicing trips associated with the community uses, an off-street servicing solution should be explored. TfL hold concerns that on-street loading and parking bays will compromise the quality of the public realm and pedestrian accessibility contrary to ItP London Plan policies T2 and D8.

Vehicles servicing the site should include sidebars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with cyclists and other road users and pedestrians on the capital’s roads. This is particularly important given the site’s proximity to the future strategic cycle network.

A construction management plan has been submitted with the Application and it is welcomed that this outlines a commitment to FORS and booking construction related deliveries outside peak highway periods. It is also welcomed that the proposed site set up will maintain safe pedestrian access through the site throughout the works for existing residents in line with the Mayor’s Vision Zero objective.

In accordance with ItP London Plan policies T4 and T7, both a Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) in full prepared in line with TfL guidance, should be secured.. Guidance can be found at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/freight>.

TfL also recommends that construction operations are reviewed in accord with national Site Operating Procedures issued in March 2020 by Government, also review traffic marshalling and vehicle access arrangements to enable pedestrians and cyclist to safely social distance and take account of the Mayor’s new Streetspace Plan.