

**Job Title:** The London Irish Centre  
**Date:** 12<sup>th</sup> August 2020

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**Subject:** Response to Comments raised by Transport for London

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## Introduction

1. Caneparo Associates is appointed by The London Irish Centre ('the Applicant') to provide traffic and transport advice in relation to the proposed redevelopment of their site which is located at the junction of Camden Square and Murray Street at 50-52 Camden Square, in the London Borough of Camden (LBC).
2. The site is currently occupied by the London Irish Centre and the proposals seek the demolition in part and redevelopment of the site to provide a new London Irish Centre community facility.
3. This Transport Note responds to comments received from Transport for London ('TfL') on the planning application (Planning Reference No: 2020/1481/P).
4. The following sections set out each comment raised by TfL in *italics* before providing a response below based on each of the responses received. The comments received from TfL have been included at **Appendix A** for reference.

## Parking

5. *The proposed development is car free in line with policy T6 (Car parking) of the new London Plan, which is welcomed. TfL would be supportive of the new community centre providing one disabled bay in line with policy T6.5 (Non-residential disabled persons parking) of the new London Plan.*

Noted. It is understood that LB Camden have confirmed that they are happy with the existing on-street disabled parking provision in proximity of the site. Blue badge holders would be able to park in those bays without restriction. This development is car free and there is no capacity for on-site parking provision.

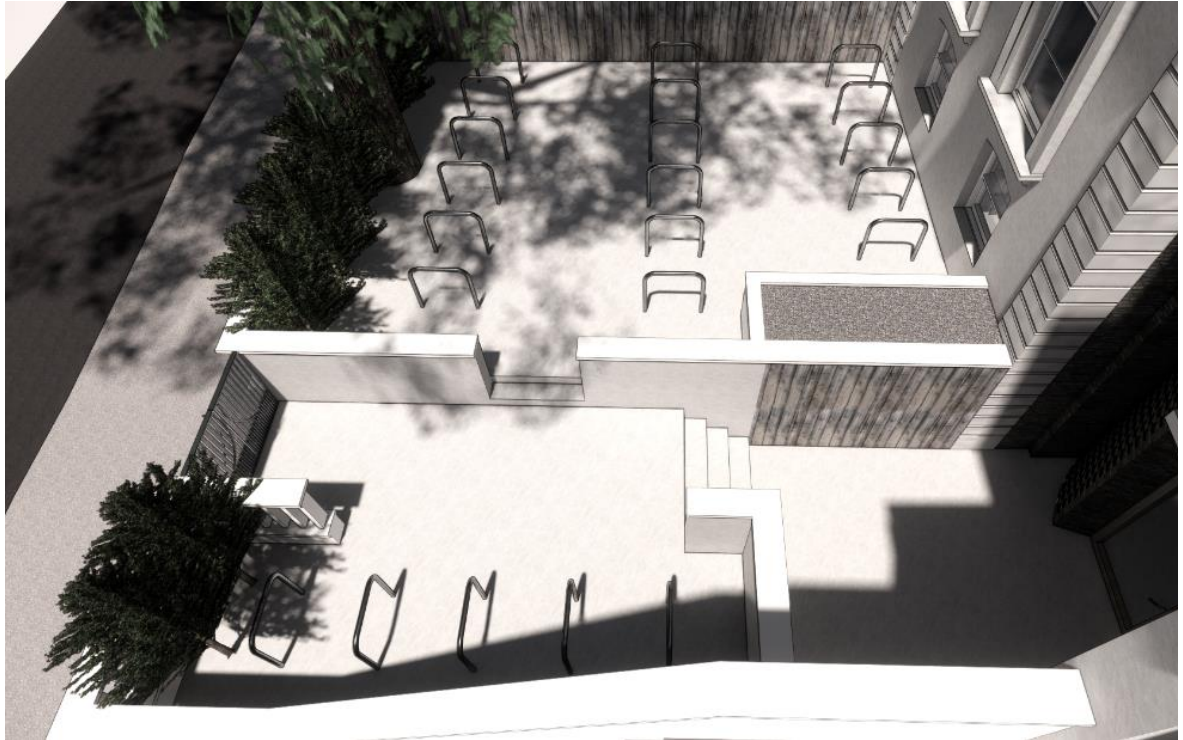
## **Cycle Parking**

6. *Whilst the level of long stay cycle parking proposed is welcome, TfL requests the level of short stay cycle parking is increased to meet new London Plan policy T5 (Cycling) minimum standards.*

Although it is noted that there is a small shortfall in short stay cycle parking, the submitted Transport Statement suggested that the additional Long Stay spaces (more than what policy requires) could be made available via Centre Management if demand for the short stay spaces exceeds capacity. This could be managed via the site's Travel Plan.

Nevertheless, following receipt of the comments, a review of the short stay cycle parking has been undertaken and an additional four spaces provided. This provides a total of 44 spaces which is three below what planning policy requires, however, facilitating the additional spaces would compromise access into the building at this location.

This is something that can be looked at further, and it is considered this could be appropriately addressed by way of a suitably worded planning condition, if required. However, it is pertinent to note that the total number of cycle parking spaces (long + short stay) meets planning requirements. The proposed short stay spaces are shown in the image below:



7. *The long stay cycle parking proposed does not comply with TfL's London Cycling Design Standard (LCDS) guidance. Specifically, As set out in section 8.2.6 (Two-tier stands) of TfL's LCDS guidance a minimum aisle width of 2500mm beyond the lowered frame is required to allow cycles to be turned and loaded. An overall aisle width of 3500mm should ideally be provided where there are racks on either side of aisles. Additionally, section 8.2.1 (Cycle parking for all) states that accessing the parking area should involve passing through no more than two sets of doors, with a recommended minimum external door width of 2 metres. TfL requests this is amended prior to the application being determined prior to the application being determined by the Council.*

Following receipt of the comments, the long stay cycle parking has been converted to four Sheffield style stands which provide space for eight cycles (five spaces more than what policy requires), in line with the requirements of the LCDS. In addition, all internal doors a cyclist needs to move a bike through will have a minimum width of 2m and push button opening mechanism to allow easier access for cyclists.

## Trip Generation

8. *The submitted Transport Assessment (TA) does not full assess the transport impact of the proposed development. Section 5.2 of the TA states 'it is envisioned that the majority of people will arrive and depart by public transport and that the arrival and departure profile will be staggered'. TfL requests the applicant provides the trip generation forecast, mode split by Overground, Underground and bus and profile of arrivals and departures , specifically when McNamara Hall will be used at full capacity in line with policy T4 (Assessing and mitigating transport impacts) of the Intend to Publish London Plan, and details of how travel mode and arrival time will be managed.*

Noted. The proposals look to provide a better more modern London Irish Centre but the day to day functions that the site offers is not proposed to change. An example of the existing offer is provided at Appendix C of the submitted Transport Statement. Therefore, the level of traffic or person trips likely to be generated on a day to day basis will be similar to the number of trips the existing facility generates.

Therefore, in our view, the approach taken with regards trip generation within the submitted Transport Statement is reasonable. However, it is acknowledged that the proposals also include increasing the total capacity of the London Irish Centre from 1000 people to 1250 people (as per fire regulations). Therefore, a trip generation exercise has been carried out below to illustrate the impact of an additional 250 people attending the London Irish Centre.

This has been carried out using a first principles approach using the following assumptions:

- Mode split based on Method of Travel to Work 2011 Census Data for the local Ward (Cantelowes)
- Taxis have an average occupancy rate of 3.0

**Table 1** sets out the consequent trip generation.

Table 1 Trip Generation		
Mode	Assumed Modal Split	250 Additional People
Taxi	11%	10 taxis
Train / Underground	37%	93 people
Bus	29%	73 people
Foot	21%	53 people
Pedal Cycle	2%	5 people

**Table 5** illustrates that under the worst-case scenario where an additional 250 people would attend the London Irish Centre, an uplift of 10 taxi movements are predicted to be generated when compared to the existing situation.

It is pertinent to note that arrival and departure profiles will likely be staggered as people will arrive and depart at different times. In addition, people wanting to use taxis will likely walk to Camden Road where there will be a number already on the highway network.

It is also pertinent to Note that (as per the existing situation) larger events are likely to begin outside of the traditional highway and public transport peak hours. Even if taxi use increases later in the evening (i.e. it is likely that a proportion of visitors to the facility arrive by public transport or by foot but leave by taxi), this increase would take place when there is more capacity on local roads. Additionally, taxis are already on the highway network and therefore many trips can arguably be classified as a diverted trip rather than being a new trip to the network.

Finally, it should be noted that it would be difficult / not possible to undertake a review of the existing trip generation (on an average day) as unfortunately given the current pandemic the London Irish Centre is closed and therefore a survey of existing users would not be possible.

## Servicing and Construction

9. *Servicing access is proposed to remain as existing. A Delivery and Servicing Plan should be secured via condition in line with policy T7 (Deliveries, Servicing and construction) of the new London Plan.*

10. *An outline CMP has been submitted. A full CMP/CLP produced in line with TfL guidance should be secured via condition and discharged in consultation with TfL.*

Noted and agreed.

### **Travel Plan**

11. *TfL is satisfied with the contents of the Travel Plan. TfL requests funding for the implementation and monitoring of the Travel Plan is secured in the S106.*

Noted and agreed.

## **APPENDIX A**

### **TfL Detailed Comments**

**TfL Spatial Planning Reference:** CMDN/20/24

**Borough Reference:** 2020/1481/P

**Location:** Camden Square, 50 - 52, London Irish Centre

**Proposal:** Redevelopment of site to provide new and reconfigured community centre and ancillary residential accommodation (Class D2) involving alterations to retained buildings at No's. 50, 51 and 52 Camden Square including replacement of two storey 'link' building; demolition of Murray Street and Murray Mews buildings and replacement with three storey building (plus basement level) with third floor terrace and new entrance; associated landscaping and cycle parking.

Many thanks for consulting TfL on the above application. TfL offer the following comments:

The site is 200 metres from the TLRN at Camden Road, and 5 bus services are available within 500 metres. 600 metres from London Overground LO services at Camden Road station, and 1km from Northern Line services at Camden Town.

The Intend to Publish London Plan was published in December 2019 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The Intend to Publish London Plan now carries significant weight in decision-making and TfL expects all new planning applications to be compliant with the policies in the Intend to Publish London Plan.

#### Parking

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### Trip Generation

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An outline CMP has been submitted. A full CMP/CLP produced in line with TfL guidance should be secured via condition and discharged in consultation with TfL.

### Travel Plan

TfL is satisfied with the contents of the Travel Plan. TfL requests funding for the implementation and monitoring of the Travel Plan is secured in the S106.

**Overall, TfL requests cycle parking is amended and a disabled parking bay provided prior to being supportive of the application.**

If you have any queries regarding this response please do not hesitate to contact me.

Many thanks

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