



247 TOTTENHAM COURT ROAD TRANSPORT ASSESSMENT: ADDENDUM

Project	247 Tottenham Court Road
Report Title	247 Tottenham Court Road Transport Assessment: Addendum
Date	17/12/20
Prepared by	Momentum Transport Consultancy
Prepared for	London Borough of Camden

INTRODUCTION

- 1.1 This technical note has been prepared by Momentum Transport Consultancy in response to comments received from LB Camden (LBC) on Momentum's Transport Assessment submitted as part of the planning application for 247 Tottenham Court Road.
- 1.2 LB Camden's highways officer's response was received on 16th December 2020. A small number of comments and questions were raised in this response, which are addressed in this addendum.
- 1.3 The conclusion of the officer report is that other than some cycle parking layout notes, the application is acceptable in transport terms.
- 1.4 This addendum follows the same structure as the officer response for ease of reference.

CYCLE PARKING

- 1.5 It is recognised in the officer's report that the provision for long-stay cycle parking spaces complies with the Intend to Publish London Plan requirements.
- 1.6 The officer requests that further details for the non-residential parking in the basement layout are required to demonstrate the locations and types of cycle parking. It is proposed that a planning condition is placed that updated cycle layout plans are provided to LB Camden.
- 1.7 The officer notes that a maximum provision of 10% of long-stay cycle spaces for office land uses in the Central Activity Zone can be provided as space for folding bicycles according to the Intend to Publish London Plan. The scheme's proposed long-stay cycle parking provision for the commercial land uses has been revised to comply with Intend to Publish London Plan requirements. A breakdown of the proposed long stay cycle spaces and the type of cycle stands is presented in Table 1.

Table 1: Long Stay Cycle Parking (non-residential provision)

Type of Cycle Stand	Proportion	No. of Spaces
Two-Tier Rack	75.7%	103
Sheffield Stand	11.7%	16
Foldable	8.8%	12
Recumbent	3.8%	5
Total	100%	136

- 1.8 As noted by the officer, the residential component requires a provision of 16 long-stay cycle spaces. The plans now show a provision of 8 tier-two racks to provide 16 spaces.
- 1.9 The officer notes the dimensional requirements for the residential cycle parking store, which the updated plans of the ground floor comply with. It is proposed that these updated plans showing sufficient door and aisle widths form part of the long-stay cycle parking planning condition.
- 1.10 It is identified in the officer's report that the short-stay cycle parking spaces are proposed to be located off-site. As discussed previously in Pre-App meetings, the spatial limitations on-site preclude the ability for short-stay spaces to be accommodated on-site. Consequently, it is proposed to provide some of the required short-stay cycle parking spaces on-street in the surrounding area. It is noted that locating short-stay cycle parking spaces adjacent to retail land uses on-street on Tottenham Court Road is likely to be more suitable for customers than locating short-stay cycle parking spaces in a basement area accessed via Bayley Street or Morwell Street.

TRIP GENERATION

- 1.11 Due to the improvement in the quality of the site's floorspace, the officer questions the Transport Assessment's assumption that the existing and future trip rates would be the same, noting that due to lower quality existing provision, there may be fewer trips than forecast.
- 1.12 The trip generation assessment has been estimated by using a well-established industry-standard methodology of forecasting trips based on floorspace, rather than considering the quality of the floorspace. Nevertheless, it is reasonable to assume that with higher quality commercial floorspace, the space occupied by users may just as conceivably be at a lower density, . It is also conceivable that lower quality office space could be used more intensively than higher quality space. Therefore, we do believe that the methodology used in the Transport Assessment is appropriate and the trip generation methodology is robust.

PARKING

- 1.13 The officer notes that new residential developments should be car-free and that the development should be subject to a car-free agreement via a Section 106 Agreement. This is accepted.

DELIVERIES AND SERVICING

- 1.14 The officer presents concern with the dwell times assumed for delivery and servicing vehicles in the Transport Assessment's Loading Addendum Note, particularly the assumed dwell time of 15 minutes for MGV vehicles. These dwell times were estimated based on survey data from Central London developments. Nevertheless, the findings of the officer's cited study the *Freight*



Data Report (City of London, 2017) are recognised. Therefore, the officer's judgement that the Morwell Street loading bay may not have sufficient capacity to accommodate loading vehicles associated with both 247 Tottenham Court Road and the adjacent development at 1 Bedford Avenue is considered reasonable for some times of the day. The officer's provision that as a contingency measure a loading bay be considered in the future on Morwell Street is welcomed.

PUBLIC HIGHWAY AND PUBLIC REALM IMPACTS

Crossovers on Morwell Street

- 1.15 The officer notes that the construction of the proposed development is likely to further degrade two crossovers on Morwell Street, that are already in a poor state of repair. It is appreciated that the crossovers would need to be repaired and upgraded with materials matching the pavement on the southern section of Morwell Street and is accepted that this is the developer's responsibility to implement.

Pocket Park on Bayley Street

- 1.16 The officer notes that construction activities may necessitate the removal and reinstatement of the pocket park on Bayley Street immediately north of the site. LBC would seek the associated costs to be covered as part of Section 106 Agreement.
- 1.17 This assessment assumes that the construction vehicle routes would impact on the Bayley Street pocket park. The submitted Construction Management Plan presents routing options, one of which would not necessitate the removal and reinstatement of the Bayley Street pocket park. If LB Camden prefers this proposed route, it is anticipated that the estimated costs associated with reinstating the pocket park would not be required. We would hope to see this reflected in the S106 Agreement.

OTHER IMPROVEMENTS

- 1.18 The officer report notes a number of other areas for which financial contributions are required. The principle of financial contribution for these areas is accepted.

CONCLUSION

- 1.19 The highways officer report notes that cycle parking breakdown and layouts remains an issue for long-stay provision. It is proposed that a planning condition is placed on a planning permission that a maximum of 10% of long-stay cycle storage can be for folding bicycles, and that further layouts are required to satisfy the highways authority. With this in place, it is anticipated that the application is acceptable in transport terms in advance of planning committee.

Project & Document Details

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