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Date: 11th May 2021

Subject: 2020/5473/P: 17-37 William Road, LB Camden
Response to GLA Highways and Transportation Comments and Queries

Introduction

1. Caneparo Associates (CA) is retained by Euston One Limited, the 'Applicant', to provide traffic and transportation advice in relation to the proposed development at 17-37 William Road, London Borough of Camden (LBC).
2. This note aims to address a number of transport related comments raised by the Greater London Authority (GLA) in its consultation response dated 8th March 2021 (GLA reference 2020/6844/S1) to the planning application reference 2020/5473/P.
3. This note follows the submission of a Transport Assessment (TA) dated November 2020 in support of the above planning application. The pages / paragraphs of the GLA response referred to above that include the transport related comments (paragraphs 74 to 88 inclusive) are included in **Appendix A** for ease reference.
4. This note includes the following:
 - Further information / details relating to the proposed highway works;
 - Further details relating to the trip generation for the site and potential effects;
 - A detailed review of the car parking requirements for the scheme;
 - Further details relating to the proposed cycling facilities; and,
 - Confirmation that the Applicant is willing to enter a Section 106 Agreement to secure a Construction Management / Logistics Plan, Delivery and Servicing Plan, a Travel Plan for the student accommodation and a Travel Plan for the affordable workspace.
5. This note should be read in conjunction with the TA referred to above.

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

GLA Comment (paragraph 75, first two sentences):

The footway alterations and wider public realm works are supported in line with Policy D8 of the London Plan. An independent road safety audits and risk assessments should be undertaken in respect of these works.

CA Response:

6. The Applicant confirms that if planning permission is granted an independent road safety audit and risk assessment will be commissioned for the proposed footway alterations along the site frontage during the detailed design / Section 278 Agreement stage and all recommendations will be incorporated where necessary and appropriate in consultation with the local highway authority London Borough of Camden (LBC).
7. It is not considered necessary to undertake an independent road safety audit or risk assessment for the proposed site frontage footway works at this stage as the works are minor and would lead to an improvement in the pedestrian environment and minor improvements to the operation of the local highway network as a result of the removal of a vehicular access point and vehicle turning movements along the site frontage.

GLA Comment (paragraph 76, first sentence):

Further clarification of what local streetscape improvements can be delivered via Section 278 (S278) to support Healthy Streets and active travel should be provided....

CA Response:

8. In terms of wider highway works, no further works beyond the improvement works to the site frontages are considered necessary or appropriate in the context of the Community Infrastructure Levy (CIL) Regulations, and in particular, Regulation 122 (as amended) as the proposals would result in a negligible increase in trips on the local transport networks as illustrated below.
9. Furthermore, the proposals include the removal of a vehicular access provide space for two vehicles to park. As a result, the proposals would result in a potential reduction in car-borne vehicle movements in the area which supports Vision Zero and active travel.

10. The weekday 12-hour trip generation for the proposed development has been estimated in the table below with reference to the 'Total People' trip rates contained within the TA at Appendix I (TRICS Report for student accommodation) and Appendix J (TRICS Report for Offices).

Table 1: Proposed Development – Weekday 12-Hour Trip Generation Estimates			
Use	Total People 12-Hour Trip Rate (trips per resident)		
	Arrivals	Departures	Total
Student Accommodation	0.689	0.749	1.438
Office Space	9.656	9.481	19.137
Use	Total People 12-Hour Trip Generation		
	Arrivals	Departures	Total
Student Accommodation (239 Bedspaces / Residents)	165	179	344
Office Space (1,255sqm)	121	119	240
TOTAL	286	298	584

11. According to the above assessment, the proposed development is anticipated to generate around 584 trips between 07:00 and 19:00 Mondays to Fridays.
12. In terms of the potential 12-hour trip generation for the proposed development at the weekend, it is likely that the office space would generate a negligible number of trips.
13. There is limited / no weekend trip rate information for student accommodation schemes located in Greater London contained within the TRICS database. Therefore, assuming the student accommodation generates the same number of trips on a Saturday and Sunday as it does the rest of the week the average 12-hour trip generation for the proposed uses can be estimated as follows.

Table 2: Proposed Development – Average 12-Hour Trip Generation Estimates				
Proposed Use	Total People 12-Hour Trip Generation			
	Mondays to Fridays	Saturdays	Sundays	Average
Student Accommodation	344	344	344	344
Office Space	240	0	0	171
TOTAL	584	344	344	515

14. Based on the above assessments, the proposed development is anticipated to generate around 515 trips, on average, between 07:00 and 19:00 Mondays to Sundays.
15. The above trip generation for the proposed uses would be offset by the trip generation associated with the existing / previous uses of the site as demonstrated below.
16. The existing uses on the site comprise of circa 3,693sqm of office / Class E(g) space. Applying the same trip rates as that set out in the table above to the existing office space results in the following trip generation estimates for the existing uses.

Table 3: Existing Office Space - 12-Hour Trip Generation Estimates (07:00-19:00)			
Use	Total People Trip Rate (trips per resident)		
	Arrivals	Departures	Total
Office Space	9.656	9.481	19.137
Use	Total People Trip Generation		
	Arrivals	Departures	Total
Office Space (3,693sqm)	357	350	707

17. The above assessment indicates that the existing office space has the potential to generate around 707 trips (circa 357 arrivals and circa 350 departures) between 07:00 and 19:00 hours Mondays to Fridays.

18. The average 12-hour trip generation for the office space, assuming the space would generate a negligible number of trips at the weekend, is therefore 505 ($707 \times 5 / 7$).
19. Based on the above, the proposed development has the potential to generate around 10 additional trips, on average, over a 12-hour period.
20. The estimated increase in average 12-hour trip generation is therefore negligible, would not be noticeable to other transport users and would not have any effect on the operation of local transport facilities, including the operation of the local road network, public transport services, pedestrian networks and cycling networks.

Car Parking

GLA Comment (paragraph 77):

The scheme's proposal as a car-free development is in line with the Mayor's Transport Strategy, Vision Zero and Healthy Streets. However, Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space.

CA Response:

21. The development proposals do not include residential development and therefore the above requirements are not applicable.
22. Policy T6.1, part E of the London Plan 2021 states:

"Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free."
23. The London Plan therefore defines student accommodation as sui-generis and not residential development.
24. With regard to the proposed office space, Policy T6.2 (Office Parking), Part A states:

"The maximum parking standards set out in Table 10.4 should be applied to new office development."

25. Table 10.4 states that new office development in the Central Activities Zone and inner London should be car-free except for disabled persons parking in line with Policy T6.5 Non-residential disabled persons parking.
26. Policy T6.5, part A of the London Plan 2021 states:
- “Disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.”*
27. Given that Table 10.6 of the London Plan does not cover student accommodation / sui generis uses and that for workspace / office uses, the disabled parking standards are based on a proportion of total parking provision, no on-site disabled parking spaces are required to meet the standards.
28. Any students or users of the proposed office space that are Blue Badge holders would be able to utilise any existing on-street resident permit holder parking bays that are located on the local (LBC maintained) roads within the vicinity of the site. This approach has been agreed with LBC and no concerns regarding disabled parking have been raised by LBC in their formal consultation response.

Cycle Parking / Cycle Routes

GLA Comment (paragraph 79, final sentence):

The applicant should also consider the parking provision of e-cargo bikes.

CA Response:

29. Given the site constraints and nature of the proposed uses it is considered that the demand for e-cargo bike parking spaces would be very low / negligible and could, if necessary, be accommodated within the proposed on-site accessible / adapted bike parking provisions which have been provided in accordance with the standards set out in the London Plan 2021.

GLA Comment (paragraph 80, second to last sentence):

Due to site constraints, the applicant has not proposed short-stay accessible spaces.

CA Response:

30. The short-stay accessible cycle parking space requirement is 0.4 spaces (at 5% of the total number of short-stay spaces that are proposed / required (8)). As the demand / requirement is very low

and given the site constraints and proposed nature of the development, no-on site short-stay accessible cycle parking spaces have been provided for the student scheme.

31. However, there are a number of stands within the vicinity of the site including on Stanhope Street opposite the site, i.e. a very short distance from the entrance to the student accommodation uses. Based on on-site observations, these stands are laid out such that an accessible bicycle could be secured to one or more of them.
32. As such, it is not considered necessary to provide any accessible spaces in addition to the accessible space proposed for the office use and the two accessible spaces proposed for the student accommodation uses.

GLA Comment (paragraph 81, first sentence):

The applicant should consider how the development will support the strategic vision of the London wide cycle network including connecting local cycle routes and cycle hubs to encourage active travel in line with Policy T1 of the London Plan and the Mayor's Transport Strategy.

CA Response:

33. As highlighted in the TA, the proposed development provides significant on-site cycle parking facilities, proposes to remove an existing vehicle access and to enhance the pedestrian environment along the site frontages. The proposals would therefore contribute to a reduction in the number of car movements in the area and generate more trips by foot, cycle and public transport. The proposals therefore support local transport policy objectives including Policy T1 of the London Plan 2021.
34. The TA also highlights that the site is located within very close proximity (circa 100 metres cycling distance) of the LBC defined 'Local Cycleway' on Drummond Street and Longford Street to the south of the site. According to LBC's cycle map (of which an extract is included in the TA), the 'Local Cycleway' on Longford Street and Drummond Street provides access to a Santander Cycle Docking Station at the corner of Longford Street and Albany Street (located a short distance to the south west of the site) and the Cycle Route S2 which forms part of Hampstead Road which can be accessed a short distance to the south west of the site. Cycle Route S2 provides access to further cycle docking stations and the wider cycle network.

35. Given the location of the site in close proximity to existing cycle routes, and that the proposed development would generate a negligible number of additional trips (and reduce the number of car trips in the area), as highlighted earlier in this note, it is not considered necessary to provide additional cycle routes or links in order to make the application proposals acceptable or to mitigate the effect of the proposals.

GLA Comment (paragraph 82, final sentence):

The detailed design and delivery of all cycle parking should be secured by condition.

CA Response:

36. The proposed cycle parking facilities and access arrangements have been the subject of detailed pre-application discussions with LBC and the proposed arrangements have been agreed. Further details have been submitted to LBC following receipt of its consultation response. Given that details of the proposed cycle parking facilities have been submitted to LBC it is considered that if a condition is required to cover this item it should only cover the delivery of the cycle parking facilities and not the detailed design.

Trip Generation and Impacts

GLA Comment (paragraph 83):

The approach to the trip generation assessment is acceptable; however, the applicant should clarify the daily profile of trips, as they would be expected to reflect resident commuting patterns in the morning peak.

CA Response:

37. The TA includes trip rate data for the proposed student accommodation uses and proposed office space. If these trip rates were combined they would not reflect resident commuting patterns in the morning peak.

Travel Demand Management

GLA Comment (paragraph 84, first sentence):

The commitment to a student and commercial travel plan should be secured by condition.

CA Response:

38. The Applicant confirms that it is willing to accept a suitably worded planning condition that secures the implementation of a student travel plan and a commercial travel plan at the scheme should planning permission be granted.
39. The travel plan for the student accommodation element would include measures to mitigate the student moving in / out periods as requested. The two travel plans would be submitted to LBC (and TfL as required) for comments / approval prior to first occupation as requested.

Delivery, Servicing and Construction Logistics

GLA Comment (paragraph 85, penultimate and final sentences):

TfL encourage the applicant inclusion of e-cargo bikes delivery into their delivery servicing plan. The final DSP should be secured by condition.

CA Response:

40. The Applicant confirms that where possible the proposed scheme would be serviced via e-cargo bikes and that it is willing to accept a condition that secures the implementation of a DSP.

GLA Comment (paragraph 87, final sentence):

...careful management of the construction period will be required and a full Construction Logistics Plan will need to be submitted for approval by TfL and the Council prior to implementation.

CA Response:

41. The Applicant confirms that it is willing to accept a condition that secures the submission for approval of a full Construction Logistics Plan (CLP) and that if any temporary highway safety measures are required during the construction phase that these are discussed with LBC and TfL and be the subject of Road Safety Audits as required / necessary prior to any measures being implemented.
42. The Applicant confirms that the full CLP will include a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating.

Summary and Conclusion

43. Based on the additional assessments and information contained within this note and in the context of the findings of the TA that was submitted with the planning application it is considered that there are no transport reasons to refuse the application.

N03 APPENDIX A

GLA Consultation Response (Transport Comments / Pages Only)

Whole Life-Cycle Carbon

73 London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon (WLC) Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website [here](#)³: The WLC Assessment must be provided prior to Stage 2.

Transport

Active Travel Zone (ATZ), Healthy Streets and Vision Zero

74 Public realm improvements works are proposed including the removal of the existing vehicle crossover on William Road and the reinstatement of the pedestrian footway.

75 The footway alterations and wider public realm works are supported in line with Policy D8 of the London Plan. An independent road safety audits and risk assessments should be undertaken in respect of these works. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

76 Further clarification of what local streetscape improvements can be delivered via Section 278 (S278) to support Healthy Streets and active travel should be provided. This includes the A400 Hampstead Road bus reliability and road safety improvements identified in the Transport Assessment (TA). The TA has identified collision clusters at the junction of Drummond Street and Hampstead Road. The applicant should consider measures to mitigate any future safety risk and deliver measures accordingly.

Car Parking

77 The scheme's proposal as a car-free development is in line with the Mayor's Transport Strategy, Vision Zero and Healthy Streets. However, Policy T6.1 of the London Plan requires residential development proposals delivering ten or more units to deliver at least one designated disabled persons parking bay for 3% of dwellings (1 space), and further demonstrate provision for an additional 7% for further demand. Commercial floorspace should also have access to at least one space.

78 In order to satisfy the above policy, the applicant and Council should confirm that there is adequate capacity within proximity of the site. It should be noted that additional on-street blue badge parking on the TLRN in the vicinity cannot be provided.

³ <https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>

Cycle Parking

79 The applicant proposes 180 long stay spaces and 8 short stay spaces for 239 student accommodation rooms, 20 long stay and 3 short stay spaces for the affordable workspaces, and re-provision of the existing residential cycle spaces of 12 long stay spaces. This is in line with London Plan Policy T5 Table 10.2. The additional student short stay provision of 20% in line with the Council's standards for larger bikes in association with accessible rooms. The applicant should also consider the parking provision of e-cargo bikes.

80 The majority of residential long stay cycle parking is proposed in the basement. The applicant is advised to make some internal design changes to improve usability and accessibility. All ground floor cycle stores are provided with step-free access and power assisted 1250mm leaf doors. Due to site constraints, the applicant has not proposed short-stay accessible spaces. The applicant should therefore seek to provide accessible short stay accessibility within the site's vicinity.

81 The applicant should consider how the development will support the strategic vision of the London wide cycle network including connecting local cycle routes and cycle hubs to encourage active travel in line with Policy T1 of the London Plan and the Mayor's Transport Strategy.

82 The applicant advises that they have followed Camden Council's cycle space standards for two-tiers, Sheffield and folding bike lockers. In addition, the applicant should clarify how they are meeting the London Cycle Design Standards (LCDS), for all cycles. The detailed design and delivery of all cycle parking should be secured by condition.

Trip generation and impacts

83 The approach to the trip generation assessment is acceptable; however, the applicant should clarify the daily profile of trips, as they would be expected to reflect resident commuting patterns in the morning peak.

Travel demand management

84 The commitment to a student and commercial travel plan should be suitably secured by condition. Mitigation may be required during student moving in/out periods for the potential increase of activity on the network. Further discussion is required with TfL officers to establish the appropriate approach for this.

Delivery Servicing and construction logistics

85 A delivery and servicing plan (DSP) has been submitted in support of the application, setting out measures to minimise and manage the impact of servicing movements. The proposal estimates 6-7 deliveries daily. TfL encourage the applicant inclusion of e-cargo bikes delivery into their delivery servicing plan. The final DSP should be secured by condition.

86 An outline Construction Logistics Plan has been submitted. Construction access will be from Hampstead Road, which TfL notes is also the route that HS2 related HGV traffic will also use. In addition, an updated Road Safety Audit (RSA) is

required as construction access uses the William Road junction with a Street Space Cycle space scheme on Hampstead Road and considering the collision data for Drummond Street and Hampstead Road. The RSA must address pedestrians/cyclists' safety around the site, particularly the northbound direction on Hampstead Road when vehicles are exiting the site.

87 The site is constrained, surrounded by neighbouring properties and the TLRN. As such, careful management of the construction period will be required and a full Construction Logistics Plan will need to be submitted for approval by TfL and the Council prior to commencement.

88 TfL expects a commitment to Direct Vision and Fleet Operators Recognition Scheme accreditation for all vehicles of at least Silver and Gold rating.

Local planning authority's position

89 Camden Council officers are currently assessing the application, a committee date has not been determined.

Legal considerations

90 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments. Article 6 or 7 directions are considered against the requirements of the 2008 Order and are not made at the request of the applicant or any other party.

Financial considerations

91 There are no financial considerations at this stage.

Conclusion

92 London Plan policies on student accommodation, design, heritage, access, energy, and transport are relevant to this application. The application is broadly supported in strategic planning terms, but the following matters should be addressed to ensure full compliance with the London Plan:

- **Principle of development:** The principle of a student-led mixed-use development within the CAZ and Euston Opportunity Area providing affordable workspace is acceptable and complies with Policies E1, H15 and H16, subject to student accommodation and affordable workspace being appropriately secured.