

Royal College Street

Project	Job No.	Doc No.	Date
Eagle Mews, 146-150 Royal College Street	1028337	TN01_P01	13/08/2021
Subject	Prepared by		
Cundall's response to LBC Comments	Valeria Riso		

This note summarises the comments received from LB Camden within their interim comments for 150 Royal College Street received on 13th August 2021 with regard to transportation aspects of the proposal (registered application under 2021/2472/P) and provides a response to each comment (in **blue&bold**).

1. Introduction

A Transport Statement (TS) has been submitted in support of this application.

The site has a PTAL rating of 6a, which is considered to be an excellent level of public transport accessibility.

There are two bus stops within a 3-minute walk, another eight within an 8-minute walk, Camden Road station is within a 4-minute walk, and Camden Underground Station is within an 8 minute walk.

Royal College Street is a Borough Distributor Road with one-way working for general traffic northbound. There is also a segregated on-street northbound cycle lane and segregated contraflow southbound cycle lane. The speed limit is 20mph.

There is an existing access to the site on Royal College Street which serves two pre-existing buildings; one also numbered 150 and another numbered 146. Most of the site has hard surfacing and examination of historical aerial photographs indicates that the surfacing has been occasionally used for vehicle parking in a seemingly informal arrangement. The proposed building would be located between the existing building 150 and Royal College Street, on an area that is currently hardstanding.

Cundall's response: Noted.

2. Trip generation

The submitted TS includes analysis of trip generation derived from TRICS software. The total person trips (all modes) is predicted to 98 arrivals and 94 departures per day. The peak hour for arrivals is 08:00-09:00 with 16 arrivals and the peak hour for departures is 17:00-18:00 with 18 departures. Regarding modal breakdown, about 98% of the person journeys would be walking or public transport and about 2% would be by car modes: taxi or car. Servicing has been estimated at 2.5 deliveries per day on average. This is very slightly higher than the TRICS estimate and is based on the demand of the existing premises sharing the access.

Cundall's response: Noted.

3. Car parking

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. To prevent the future occupants from obtaining on-street parking permits from the Council, the development should be car free, and this should be secured by means of a Section 106 Agreement.

The current layout shows two disabled parking spaces on the site. This would be contra to Camden's car-free policy as it would not be possible to enforce against ineligible users. I would challenge the need for two disabled parking spaces for such a small development in an area with a PTAL rating of 6a. Correspondence from the applicant dated 28 July 2021 quotes the 2021 London Plan: *'all non-residential elements should provide access to at least one on or off-street disabled persons parking bay'*. Camden's view is that on-street spaces can be used. There are 15 residents' bays in Royal College St within 50m of the site and Blue Badge holders can park in residents' bays. CPG Transport Clause 5.20 states: *For all minor developments, the Council will aim to accommodate disabled parking provision on-street...* The on-site disabled bays should therefore be removed.

Cundall's response: The on-site disabled bays have been removed.

4. Cycle parking

The proposal includes 12 long stay and 2 short stay cycle parking spaces and this complies with the London Plan standards. Long stay parking would need to be covered and secure, and details would need to be submitted and approved; this could be conditioned.

Cundall's response: Noted.

5. Deliveries and servicing

The site has a vehicular access off Royal College Street which presently serves the two existing buildings. There is ample opportunity for servicing vehicles to turn in the existing layout, particularly on the hardstanding in the northwest of the site. This area would be overbuilt by the proposal and would not be available in the future. A Delivery and Servicing Plan (DSP) has been submitted in support of the application and further correspondence has been received. An estimate has been made of servicing demand for the proposed building and of the two other premises using the existing access: 2 deliveries per day for the proposed building and 4 deliveries per day for the existing premises (on average), giving a total of 6 deliveries per day. The DSP states that the size of servicing vehicles will be limited to 3.5t vans.

The latest correspondence offers three options for servicing:

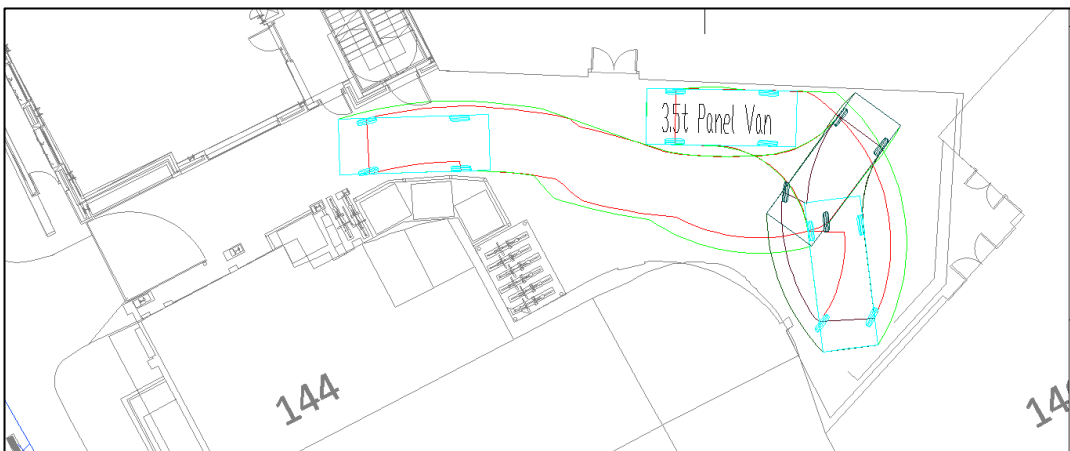
- Van enters site, carries out a turning manoeuvre, and leaves in a forward direction.
- Van enters site, then reverses out onto Royal College Street, then continues north.
- Van uses the loading bay, south of the site, in Royal College Street.

I will discuss each of these in turn.

A swept path drawing has been submitted for the on-site turning manoeuvre, showing a 7-point turn. (The applicant describes it as a 6-point turn. This is a semantic point, but I consider a manoeuvre with: 1 reverse to be a 3-point turn, 2 reverses to be a 5-point turn, and 3 reverses to be a 7-point turn). The tracking is based on a van of width 1.986m. This is not a conservative estimate of the upper limit given that the width of a Ford Transit with folded back mirrors is 2.112m. The tracking over-sails a footpath and would clash with an open door. In mitigation of the last two points, the applicant states that the footpath is the same level at the access route (but made of a different material). Also, the door is used for maintenance is anticipated to always remain closed. The second point raises a question as to where the main entrance to the new building would be as the only other entrance door at ground level appears to have a width of only 800mm.

Taking all the preceding factors into account, I consider there is a real risk that drivers would not attempt the turning manoeuvre, rather they would reverse out of the site. This would have inherent dangers and I cannot support this proposal.

Cundall's response: Please note revised tracking drawing TC-005-P04 (extract included below), indicating a 3-point turn manoeuvre performed on-site by a 3.5t panel van vehicle.



The second option, wherein the delivery vehicle reverses out of the site, would require vehicles to reverse in a southerly direction in Royal College Street, which has one-way working northbound. The manoeuvre would be unlawful and would render the driver liable for a penalty charge notice. (Offence code 32W). We would not approve a scheme whose operation depended on an unlawful manoeuvre.

Cundall's response: Comment now superseded. See answer to option 1 above.

The third option would utilise the existing loading bay in Royal College Street. It is some distance away from the site. From the new building it would be 65m and from the building at 146 it would be 88m to the midpoint of the bay. This would be far from ideal for the new building and a degradation of standard for the existing buildings, which currently have on-site loading. There is also the possibility that the on-site bay will not always have space available for the 6 deliveries expected on an average bay. Circumstances may tempt some drivers to enter the site and then reverse out.

Cundall's response: Comment now superseded. See answer to option 1 above.

None of the above three options are satisfactory. A preferable option would be for vans to turn in the area shown with disabled parking in front of 146. This has more space than the turning area shown on the swept path layouts. It should allow a significant improvement on what has been proposed and might accommodate a 3-point turn.

Cundall's response: Comment now superseded. See answer to option 1 above.

Notwithstanding the turning issues mentioned above, the DSP is broadly acceptable. The DSP would need to be secured by a s106 planning obligation.

Cundall's response: Noted.

6. Excavation near the public highway

We must ensure that the stability of the public highway adjacent to the site is not compromised by excavations. If we considered the highway to be at risk, the applicant would be required to submit an 'Approval in Principle' (AiP) report to our Highways Structures & Bridges Team within Engineering Services as a pre-commencement obligation. The levels of the site fall near the Regent's Canal and there appears to be a retaining wall supporting the highway at the northern end of the site. Whilst the retaining wall might be sufficient to protect the highway during and after construction, it is not clear what is happening to the ground levels and whether there would be any excavation that could affect the retaining wall's stability. We require more information such as a cross section showing the highway, the existing and proposed ground levels, and details of excavation for building works.

Applicant's response: Cross section drawings have been submitted with the application and a ground movement assessment has been commissioned. However we would be happy with a pre-commencement obligation to provide an AiP report.

7. Managing and mitigating the impacts of construction

Construction management plans (CMPs) are used to demonstrate how developments will minimise impacts from the movement of goods and materials during the construction process (including any demolition works). Our primary concern is public safety, but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion in the local area. The proposal is also likely to lead to a variety of amenity issues for local people (e.g., noise, vibration, air quality, temporary loss of parking, etc.). The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is particularly important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

We would seek to secure a CMP, a CMP implementation support contribution of £3,920 and a Construction Impact Bond of £7,500 as section 106 planning obligations in accordance with Policy A1. The Council has a CMP pro-forma which must be used once a Principal Contractor has been appointed. The CMP in the form of the pro-forma, would need to be approved by the Council prior to any works commencing on site. The CMP pro-forma is available on the Camden website: <https://www.camden.gov.uk/documents/20142/1269042/CMP+pro+forma+03-02-2020.docx>.

The applicant has not explained how construction access would be achieved but given that a Trief Kerb and pedestrian guard rail extends along most of the site frontage, it seems the only option would be to use the existing access.

Cundall's response: Noted.  It is confirmed that the construction access would be via the existing access.

8. Highway works contribution

The existing access is likely to sustain significant damage because of the proposed demolition, excavation and construction works required. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development.

A highways contribution would need to be secured as a section 106 planning obligation if planning permission is granted. This would allow the Council to repave the carriageway adjacent to the site, provide new footways along the eastern and western frontage of the building and repair any other damage to the public highway in the general vicinity of the site. The highway works would be implemented by the Council's highways contractor on completion of the development. A cost estimate for the highway works has been requested.

Cundall's response: Noted.

9. Travel planning

A draft Travel Plan has been submitted with the application. If approved, the application would require the Travel Plan to be secured by a s106 planning obligation.

Cundall's response: Noted.

10. Summary and conclusions

The proposal is not acceptable because:

- The on-site disabled parking would not be in line with Camden's car-free policy, Blue Badge holders would have access to parking near to the site.

Cundall's response: on-site disabled bays have been removed.

- Servicing arrangements for the proposed development would be unsatisfactory and those for the existing buildings on the site would be compromised.

Cundall's response: following removal of the on-site disabled bays, the space can be used by a 3.5t panel van vehicle to perform a 3-point turn manoeuvre as explained in the above comment 5.

It should be possible for the applicant to overcome the above issues.

Further information is required in relation to the building structure and external works to determine whether an AIP would be required.

If approved, the following s106 obligations would be required.

- Car free
- Delivery and Servicing Plan
- Construction Management Plan
- A Highway works contribution (to be determined)
- Travel Plan

The cycle parking would need to be conditioned.

Cundall's response: Noted.