

Transport for London



Our Ref: 17/4792
Your Ref: 2017/5497/P

Jennifer.Walsh@Camden.gov.uk
Camden Council
By email only

Transport for London
Borough Planning

5 Endeavour Square
Westfield Avenue
London E20 1JN

Phone 020 7222 5600
Fax 020 7126 4275
www.tfl.gov.uk

10th November 2017

Dear LB Camden,

Re: Ugly Brown Building, 2-6 St Pancras Way – Tfl Initial Comments

Thank you for consulting Tfl on this referable planning application. Tfl notes from the documents submitted that the proposal is:

Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work.

Please note the following comments represent the views of Tfl officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the GLA.

Location & Context

The site is located on land between St Pancras Way and Regent's Canal, north of St Pancras International train station. It is bound to the east by Regent's Canal, to the south by Granary Street and St Pancras Hospital, to the west by St Pancras Way (A5202) and to the north by residential developments.

St Pancras Way is not part of either the Transport for London Road Network (TLRN) nor the Strategic Road Network (SRN). The closest part of the TLRN is Camden Road A503 approximately 325m north at the top of St Pancras Way A5202.

The site is approximately 600m (7-8 minutes walk) north of the nearest entrance to St Pancras International train station and Mornington Crescent underground station is approximately 650m east (8-9 minutes walk). The 214 and 46 bus services serve the Royal College Street stop approximately 290m away (3-4 minutes' walk).

The PTAL rating of the vast majority of the site is 6b on a scale of 1 to 6 where 1 represents poor and 6 represents excellent. A small segment is 6a, which is also excellent.

The site is fairly distant from the Tfl Cycle Superhighway (CS) network but will soon benefit from proximity to CS11 between Swiss Cottage and the West End. A significant number of segregated and

Transport for London



quiet local cycling routes connect the site with local amenities such as Camden High Street and Kings Cross St Pancras. The adjacent Regent's Canal towpath also provides an off-road walking and cycle route to the west and east.

Trip generation

TfL is satisfied the vehicular trip generation is unlikely to produce a severely negative impact on London's strategic highway network, even despite 6,377 sq m of proposed B8 'self-storage' use, which will allow members of the public to leave and collect goods, often by car.

The bus passenger numbers from the trip generation table may require some bus service enhancement, especially given that there are only two bus routes that run reasonably close to the site. However both routes operate with single deck buses and many people would not be prepared to walk from St Pancras or Mornington Crescent stations so instead would catch a bus. To determine whether additional capacity is required please can the developer provide bus trip generation figures split by direction.

Car Parking

There is an existing ground floor car park at the site which is accessed from St Pancras Way and includes 44 spaces. The car park is currently used by fashion brand Ted Baker, who occupies part of the building.

In addition there is informal parking/loading for at least 6 vehicles at the main site frontage to St Pancras Way, on hard landscaping behind the footway.

The site is also within a Controlled Parking Zone (CPZ) which operates Monday to Friday from 08:30 and 18:30. There are 'pay by phone' bays along St Pancras Way adjacent to the site, which allow a maximum stay of 2 hours.

The development is proposed to be car-free except for re-provision of 30 spaces for a new Ted Baker HQ and 2 on-street wheelchair accessible car parking spaces. Whilst this is within London Plan standards, given the location of the site, consideration should be given to reduced provision or indeed a completely car free development.

TfL would accept this level of provision if required by legal agreement with Ted Baker, provided it will be converted to other uses if and when this business moved out.

TfL requests all residents are exempt from parking permits in the area, except for Blue Badge holders, to maximise the benefits of this car-free scheme. In addition a parking management condition should be imposed on any planning permission to ensure parking is used only by Ted Baker staff and to manage the use of Blue Badge spaces. Reuse of the spaces for other purposes on Ted Baker leaving the site should also be appropriately secured.

Pick up/drop off

Taxis, including for disabled passengers, will be able to serve Plot A at the east end of North Street on St Pancras Way. For Plots B and C, pick up/drop off will be provided at either end of the accessible route across Plot C on St Pancras Way, near the Ted Baker Headquarters entrance, and also at the southern end of the internal shared space off Granary Street. Each of these locations is within 50m of the main building entrances, which is satisfactory.



Cycle Parking

The cycle parking spaces would meet minimum London Plan standards. According to drawings provided, cycle parking would be located at the basement and ground floor level. Access to cycle parking facilities at the basement level may be via a ramp but it would be useful if the applicant could confirm this. TfL would be concerned if the sole access was via stairs and would wish to confirm suitability of a lift if this was the intention.

Additionally, it would be good to understand how the access to cycle parking facilities operates. Drawings suggest that users may need to negotiate more than 3 internal doors and right-angled corners in order to access the store facilities. If so, the design of the cycle parking is against London Cycling Design Standards (LCDS) guidance and should be altered (see LCDS Chapter 8 – Cycle Parking).

5% of spaces should be suitable for use by larger bikes such as cargo bikes and those used by disabled cyclists. As a result they should not be on racks and will ideally be Sheffield stands or similar with wide aisles.

Healthy Streets

The London Plan (para 2.43) notes that parts of Inner London “suffer from a legacy of ill-conceived and sometimes poorly managed development which has received inadequate subsequent investment, especially in the public realm.”

This was recently reinforced by the publication of Healthy Streets for London (February 2017) and Healthy Streets feature heavily in the forthcoming London Plan and new Mayor’s Transport Strategy (MTS), recently published in draft.

This includes being able to enjoy clean air and an environment that feels safe, relaxed, easy to move through and not too noisy. Developers, local planning authorities and other relevant stakeholders must prioritise active travel and look to balance user needs, creating inclusive environments that can be accessed and enjoyed by all.

Walking

The PERS audit submitted is satisfactory. The Council may wish to request a Section 106 (S106) contribution for addressing the issues highlighted as ‘amber’, as improving the health of Londoners through transport planning and urban design is now a key priority for the Mayor and TfL. Wayfinding in the vicinity of the site should also be improved, especially around Mornington Crescent London Underground (LU) station and to direct pedestrians between the site and Euston, Kings Cross and St Pancras stations given the walk distance and the complex route. Signage on or to/from the Regent’s Canal towpath should also be considered. The Council should therefore secure a S106 contribution of up to £32,000 (a standard Legible London plinth costs £7-8,000 including production and installation). Appropriate locations for up to 4 signs should be identified prior to commencement of the public realm works proposed, and the signs should be installed, or a future arrangement for their installation should have been agreed in writing by TfL, prior to completion of the development.

Cycling

The applicant has prepared an audit of local cycling conditions and cycle parking. We support the scope of the assessment prepared. However, the methodology used is not either a Cycling Level of Service Assessment (CLoS) or Cycling Environment Review Survey (CERS) but more of a

Transport for London



qualitative/photographic survey. The use of either CLoS or CERS would have provided a more robust and comprehensive assessment.

It is unclear from the Design and Access Statement how permeable the main site will be to cyclists and at which points cyclists will be able to enter and exit. The applicant should demonstrate how cycling permeability through the site will be maximised. TfL requests a clearly labelled drawing to clarify this, which can also be used to discuss appropriate locations for new Legible London signage.

24/7 unimpeded access to the public realm within the site and to the canalside for recreation and relaxation must be secured by condition or the S106 agreement.

Servicing & Construction

The proposed development includes a new in-set loading bay at the frontage of Plot A to St Pancras Way, able to accommodate large rigid goods vehicles; a direct two-way vehicular access from St Pancras Way into the new basement car park and servicing area for Plot B; and an on-site service yard internal to Plot C, accessed from Granary Street. A draft Deliveries and Servicing Plan (DSP) has been provided, which is broadly satisfactory. However the Council should consider making the applicant strengthen the document with more SMART targets, a commitment to ban workplace deliveries, and a firmer commitment than 'wherever possible' to servicing only outside peak hours. Night time servicing may be suitable at this location given neighbouring uses include a Builders Merchant and student accommodation, and it should therefore be considered in order to reduce the impact of servicing this development on London's strategic highway network.

At the GLA preapplication stage, the potential for servicing of the site by canal boat was discussed. Regents Canal is part of the Blue Ribbon Network as specified in Policy 7.24 of the London Plan. Policy 7.26 (Increasing the use of the Blue Ribbon Network for Freight Transport) states that "Development proposals close to navigable waterways should maximize water transport for bulk materials, particularly during demolition and construction phases." (Bd)

TfL is aware of leisure moorings at the site's main frontage to Regents Canal, which will be maintained as part of the development. The local Regents Canal Trust are keen for future occupiers of the development to be able use these moorings for freight and servicing.

TfL would therefore support a condition encouraging servicing of the development by canal boat during both site clearance and construction, and once the building is occupied. TfL would also support the development being future-proofed so that servicing by canal boat is possible for future occupiers.

The Council may wish to secure a full Construction Logistics Plan by condition, to be produced following TfL's guidance (available from: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>). As stated in the new TfL guidance (p. 33):

Planned measures are specific techniques that are agreed and committed to through the planning permission process. They are used to influence behaviours that reduce environmental impact, road risk and congestion. Planned measures need to be SMART (Specific, Measurable, Agreed, Realistic, Timely) easily interpreted, implemented and monitored.

Transport for London



Such measures should be agreed in the Outline CLP prior to planning permission being granted, then revisited when the Detailed CLP is defined prior to commencing construction.

The measures included in the submitted Outline CLP are welcome but lack detail. TfL encourages the Council and applicant to consider rewriting the CLP to follow our new guidance. A clear list of mitigation measures should be agreed and acknowledged in the document to enable local Council officers to enforce on site if necessary if agreed measures are not implemented 'on the ground' once construction commences.

If sub-contractors are yet to be appointed, SMART targets adopted based on the new TfL guidance will ideally subsequently form part of the briefs and performance indicators used to procure them, in order to 'lock in' sustainable practices across the construction team and throughout the life of the build.

Travel Plan

The framework Travel Plans submitted are broadly satisfactory. However they repeat the TA extensively and the mode share for cycling, taken from the 2011 Census, is likely to be out of date. TfL would suggest a higher and more realistic mode share for cycling is agreed with the Council. A 15% cycling mode share should be targeted within 5 years and, given the close proximity of local amenities and employment opportunities highlighted in the TA, an ambitious 3.5% percentage point increase in walking.

TfL would welcome a discussion with Camden on the preparation of TPs for approval prior to occupation, or the commitment of further measures to promote active and sustainable travel and discourage car trips, which the Council may wish to secure by condition and/or in the s106 agreement. TPs should be produced following TfL's guidance (see <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>).

The draft Mayor's Transport Strategy (MTS) sets a Healthy Streets target that by 2041 all Londoners should do at least 20 minutes a day of active travel they need to stay healthy. This target should be the overall vision for any development, focusing the modal shift particularly to walking and cycling.

For the employment uses, the Council may wish to mandate achievement of at least a Gold STARS accreditation within 3 years in the S106 agreement, as the national sustainable travel group Modeshift has recently expanded the programme from schools to both schools and workplaces. As Ted Baker will be reoccupying the site and will also have an interest in the hotel, such a planning obligation would be much easier to enforce than in most speculative commercial developments.

The Council may also wish to secure TRICS-compliant Travel Plan monitoring using their Standard Assessment Monitoring service (see <http://www.trics.org/Sam.aspx>). Current TfL guidance states that all full travel plans must use TRICS compliant monitoring surveys.

Mayoral Community Infrastructure Levy (MCIL)

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1st April 2012. All new developments that create 100 m² or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in Camden.

Transport for London



Summary

The following issues stand to be resolved between Camden Council, the applicant and TfL:

- ∞ Residents to be exempt from parking permits, except Blue Badge holders
- ∞ Justification for the 30 car parking spaces for Ted Baker and if spaces are provided reuse of the car parking for other purposes if Ted Baker move out
- ∞ Subject to assessment of requested further information, a bus service enhancement S106 contribution
- ∞ A S106 contribution of up to £32,000 for Legible London signage (4 signs)
- ∞ A condition encouraging servicing of the development by canal boat during both site clearance and construction, and once the building is occupied.
- ∞ Confirmation 5% of cycle parking space will be suitable for larger bikes and use by disabled cyclists
- ∞ General cycle parking to be redesigned so all meets TfL LCDS guidance, with none accessible through 3 sets of doors and clarification of whether a ramp is to be provided
- ∞ Travel Plan and/or active travel measures to be secured
- ∞ A clearly labelled drawing to clarify cycling permeability and access points

I hope these comments are helpful. Please do not hesitate to contact me if you would like any clarifications on the issues raised above.

Kind Regards,
Gavin McLaughlin
Planner – TfL Borough Planning

