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| To | Steve Cardno (London Borough of Camden) |
| Cc | David Bowers (SDG), Geoff Taylor (Almacantar) |
| From | Rob Goodall/Peter Twelftree |
| Date | 7 June 2012 |
| Project | Centre Point | Project No. | 22409501 |
| **Subject** | Response to London Borough of Camden TA Comments  |

This memo has been produced in order to respond to comments made by Steve Cardno of London Borough of Camden (LBC) regarding the Centre Point Transport Assessment (TA) that was submitted informally for comment on 16th May 2012.Comments were received on 23rd May.

LBC comments are highlighted in italic red text with SDG’s response below.

## East/West Pedestrian Link

*I note that the east-west pedestrian link which we have asked to be considered has not been discussed in the draft TA. However, following our telephone conversation this morning, I now understand that it will be discussed in the revised draft.*

The east-west pedestrian link is included as part of the Planning Application but please note paragraphs 1.20 to 1.22 (page 13)in the TA (and the same paras in other submitted documents) explaining that the applicant and the consultant team have yet to be convinced that this is the most appropriate solution.

## Parking and Access

Paragraph 4.38 on page 45 discusses our development policy DP18. I would suggest you discuss our car free and car capped policies. In addition, I suggest you discuss the basis for maintaining part of the existing on-site car parking provision. I appreciate this is probably linked to viability. I suggest you refer to paragraphs 5.19 and 5.20 on page 28 of CPG7 Transport which is available on our website (see hyperlink below). Perhaps you would prefer to discuss these points further in the Parking and Access section on page 30.

The proposed 36 spaces falls below the maximum number of spaces based on the Camden Core Strategy, Camden Development Policies, the Mayor’s Transport Strategy and the Mayor’s Transport Plan. The level of car parking provision (36 spaces for 118 apartments)will actively discourage the use of private cars and promote active modes of transport.

Additionally, no on-street parking permits will be issued to residents and it is therefore expected that Centre Point falls under the definition of car capped development from Camden Planning Guidance Note 7.

*There is a section on Parking and Access on page 30.  I had expected to see much more detail.  Perhaps this will be provided in other documents.  Please note that we will expect cycle parking for the residential units to meet the minimum requirements of TfL’s cycle parking standards (1 space for dwellings with 1 or 2 bedrooms; 2 spaces for dwellings with 3 or more bedrooms).  I note that 174 cycle parking spaces would be provided.*

*A breakdown of the proposed provision for each land use would be useful.  A description of the type of cycle parking facilities to be provided would also be useful (e.g. Sheffield Stands or Josta Racks).  I note that the cycle parking facilities would be provided in the basement and would be accessed from Earnshaw Street via the car lifts.  We would also require drawings to show the proposed locations and layout details.  Please note that we would expect separate cycle parking facilities for each land use (i.e. separate bicycle storage rooms).  Any other facilities to be provided should also be described (e.g. changing rooms, showers, lockers etc).*

In line with Camden’s requirements, 161 cycle parking spaces are being provided in the basement, which is accessed using the car lifts. 31 cycle parking spaces will be provided on street for retail visitors.. A breakdown of the proposed provision for each land use is provided in the Ta (Table 3.2 0n page 60) and re-produced below.

Table Proposed Centre POINT Cycle Parking

|  |  |  |  |
| --- | --- | --- | --- |
| Use | Standards | Proposed Area (m2) | Cycle Parking |
| Residential | Residents (1 per unit) | 31,994 (118 Units) | 118 |
| Visitors (1 per 10 units ) | 12 |
| Retail | Staff (1 per 250 sqm ) | 7,667 | 31 |
| Visitor (1 per 250 sqm ) | 31 |
| **Total** | **39,661** | **192** |

The drawings included within the TA indicate the location of cycle parking, storage areas and changing facilities locker provision within the basement areas Additional detailed drawings are provided in the D & A Statement prepared by Rick Mather which is included in the Planning Application submission.

*In terms of car parking, we would require drawings to show the proposed location and layout details. We would also require 20% of the parking to be suitable for electric vehicles, so electric charging points would need to be provided. Such parking spaces and disabled parking spaces should be clearly marked on the drawings.*

The car park layouts in the D & A also show the location of 11 parking spaces with access to electric charging points.

## Trip Generation and Mode Split

*I note that you have used the 2001 census data for predicting modal share. I appreciate that the 2011 census data is not yet available. However, I wonder if there are other more recent sources which could be used. One example might be the Mayors Transport Strategy. Another example might be TfL’s Travel in London Report which is available at the hyperlink below:*

Other sources of modal share information such as the Mayor’s Transport Strategy and TfL’s Travel in London report were investigated when determining the modal split. Both these documents contain modal split information regarding travel in London. However, these modal splits are amalgamated for the entirety of London, or at best split between inner and outer London. It is considered that, despite the age of the data, that the Census Journey to Work information more accurately represents the travel habits of residents and employees in the area around Centre Point.

*Table 5.6 on page 53 provides details on the office developments which have been used as a basis for trip generation. I am slightly concerned that these sites are much smaller than the Centre Point site. I would suggest you consider larger sites, although I appreciate that the TRAVL database is quite limited in terms of comparable sites. I would be willing to accept information from TRICS if TRAVL cannot be relied on.*

It is noted that the sites selected from TRICS and TRAVL are small in comparison to the floor area of the existing office. However, there is a lack of comparable sites in TRAVL that have car parking available to employees. The trip rates of the larger, car free sites are comparable to the sites selected therefore we believe that the sites chosen provide a robust set of data.

*I am assuming that the trip generation predictions for the existing use are based on the assumption that the Centre point buildings are fully occupied. However, I understand this is not actually case. I understand that much of the office space is currently vacant. It would therefore be useful if you could provide some details on the actual existing trip generation. Perhaps you could undertake a survey on a typical working day.*

The trip rates have been applied to the full existing office floor area as the building is fully occupied with the exception of a single floor.

## Cumulative Developments

*There is a section on Cumulative Developments on page 64. I would suggest that you also include the following developments in the vicinity of the site:*

*135-155 & 157-165 Charing Cross Road (includes 1-23 Oxford Street). Planning permission was granted by Westminster City Council’s development control committee on 19th April 2012.*

*Proposals are due to come forward shortly for the site on the northwest corner of the St Giles Circus junction. This would constitute the 2nd phase of development on the site bounded by Oxford Street, Tottenham Court Road and Hanway Street. The emerging scheme proposals comprise alterations to existing buildings at the western end of the site (i.e. west of the Primark store) (including the removal of Oxford College) to create additional retail floor space at basement, ground and first floors with residential development above. I can provide contact details of the applicant’s transport consultant if this would be useful.*

We discussed these additional sites with URS who prepared the ES and decided not to include them in the cumulative development assessment. Our and URS’s conclusion is that the overall cumulative effect of other developments is negligible (para 6.25 on page 105) and the additional sites would not change this conclusion.

## Delivery and Servicing

*There is a section on Servicing Arrangements on page 30. I remember we previously discussed an idea to provide a loading bay on New Oxford Street once St Giles High Street (north) has been stopped up. I assume this is not being pursued. I wonder if you should also discuss emergency access arrangements under this section or perhaps in a separate section.*

*I have had a quick look at the draft Delivery and Servicing Plan. I note that 133 two-way trips are being predicted for a typical working day. This would represent an increase of 35 trips when compared to the trip generation predictions for the existing land uses. I assume the trip generation predictions include waste and recycling collections. I appreciate that trips will be planned/scheduled in order to minimise the impact on the surrounding highway network. However, it would be useful if a breakdown of the 133 daily two-way trips could be provided. This could be in the form of a table, summarising the type and number of vehicles likely to arrive/depart the site each hour throughout a typical working day.*

The proposed loading bay on New Oxford Street is indicated in the D & A and Application drawings as a section of footway with a dropped kerb. It could be used as a taxi rank and furniture loading/unloading by residents.

In the TA we suggest bollards at the southern end of the proposed piazza across the former St. Giles High Street (north) which would lower to allow access to emergency vehicles.

After a recalculation of the floor areas, it is now estimated that there will be an overall decrease in servicing trips to and from the proposed development as compared to the existing development. There is estimated to be a net reduction of 17 vehicles accessing the site across the day i.e. approximately 1-2 service vehicles fewer per hour. This is mainly as a result of the change from office to residential land use. These calculations include waste collection and deliveries.

As stated in the TA (para 8.14 on page 122) and in the Delivery and Servicing Plan (DSP) the proposed development will have a managed delivery profile and as such will have a flat profile of trips across the day. As such there are the same number of vehicles servicing the development every hour across the day (from 05:00-22:00). A table showing this is contained within the servicing chapter of the TA (Table 8.3 on page 123) and within the DSP.