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10th July 2012

Dear Amanda,

Centre Point Tower, Centre Point Link and Centre Point House, 101-103 New Oxford Street and 5-24 St Giles High Street, London WC1A 1DD – LB Camden, TfL's initial comments

I write following receipt of the above referable planning application. Please note that these comments represent an officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge their requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

Site Location

The site is bounded to the east by Earnshaw Street, to the north by the A40 New Oxford Street, to the south by Denmark Street, and to the west by the A400 Charing Cross Road. St Giles High Street also forms part of the A40 and runs through the middle of the site. It is however currently subject to, as the rest of the highway network in the vicinity, a number of temporary changes and diversions associated with Crossrail and London Underground (LU) upgrade works at Tottenham Court Road station, immediately to the west of the site. The A40 and A400 form part of the Strategic Road Network (SRN), with the nearest part of the Transport for London Road Network (TLRN) being the A3211 Victoria Embankment, approximately 1km to the south-east of the site.

Tottenham Court Road station is served by the Central and Northern lines. Victoria line services from Oxford Circus Station and Piccadilly line services from Leicester Square Station are also available within walking distance. In addition, there are 18 bus routes available within 640m (an 8 minute walk) of the site. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. The accessibility of the site will be further

increased following the introduction of Crossrail services at Tottenham Court Road in 2018.

As well as being the traffic authority for the Strategic Road Network, TfL has an interest in this development due to its proximity to, and potential impact on, Tottenham Court Road station and bus standing facilities in the area. There are also a number of schemes that affect the highway network in the area and which are currently under consideration, including temporary road closures and diversions due to Crossrail construction, the St Giles Circus Urban Realm scheme (and associated submission under Schedule 7 of the Crossrail act), and its associated proposals to introduce two way working for buses on Tottenham Court Road and Gower Street. This application needs therefore too be considered in the context of these other schemes.

Traffic Impact

The submitted Transport Assessment states that the closure of the northern end of St Giles High Street has been modelled, and the results presented to TfL's Network Management Group (NMG). However, it needs to be clarified that this is not the case. Whilst it is intended to model the impact of the closure as part of the ongoing modelling work associated with the Tottenham Court Road two-way scheme, this is currently still not finalised and may not be agreed for some time. The modelling presented to the NMG to date has focussed primarily on improvements to the pedestrian crossing provision at the Charing Cross Road / Oxford Street junction assuming that St Giles High Street remains open to service vehicles and to buses. Likewise, although TfL has previously confirmed that the relocation of bus stands to Earnshaw Street from St Giles High Street could be feasible with or without two-way working in Tottenham Court Road, no such assessment has however been carried out using traffic modelling as stated at paragraph 7.2 of the transport assessment.

As such, there is a need for the impact of the closure of St Giles High Street to be fully modelled. This assessment would need to use the existing models as a baseline and which the transport assessment accepts are not yet finalised (paragraph 7.3). This would also need to consider both the AM and PM peak periods, and assess the impacts of the closure both with and without two-way working scenario on Tottenham Court Road.

In order to carry out this assessment it will be necessary to understand any redistribution of traffic caused by the closure of St Giles High Street, which would inform the scope of any modelling required. At present, it appears to have been assumed that all traffic would instead use Earnshaw Street or Denmark Street, which seems overly simplistic by TfL. It also does not take into account the potential for Denmark Street to be closed to through traffic as part of the wider public realm improvements and which would need to be taken into account in the future scenarios.

The above scenarios are assessed against a baseline year of 2018,

assuming completion of Crossrail and LU upgrade works at Tottenham Court Road along with the highway layout reverting to an agreed final state. However, the current timescale for the development involves works commencing in 2013, and the closure of part of St Giles High Street to create a works site. No assessment of the highways impact of this closure has been carried out as part of the application. If the intention is to close St Giles High Street so early in the construction of the proposed development, the impact of this must be modelled to assess its acceptability. This could utilise the existing modelling undertaken by LU as a base, starting with the model produced for Phase D3 of the construction works and also modelling the impacts through phases D4 and onwards. However, models for these phases have not yet been finalised and agreed which might have implications upon the developer's proposed timescales.

Given the likely difficulties associated with this, TfL would suggest that the applicant should consider whether the site can be developed without the need for a full closure of St Giles High Street (north). This may be possible if a reduced road width for this section can be agreed. However, TfL would note that this is likely to require the early relocation of some bus standing and provision of alternative loading facilities for local businesses, which will need to be addressed.

Although bus issues are considered in further detail below, following recent discussions with the applicant pre-submission of the application, it is understood that the relocation of a bus stand to the northernmost end of Earnshaw Street is currently being considered as an alternative to offside bus stands on St Giles High Street. Given the potential proximity of the stand to the Earnshaw Street / New Oxford Street junction, the impact of this would also need to be modelled, building on the above scenarios.

Buses

Given the reduction in the number of bus trips associated with the development as outlined below and the site's proximity to a number of high frequency bus routes, it is accepted that the site will not result in an unacceptable impact on the local bus capacity.

However, as previously stated, the application does propose the relocation of a number of bus stands following the closure of the northern part of St Giles High Street. TfL has a requirement for a minimum of 10 bus stands in close proximity to Tottenham Court Road station in order to operate services in the area. It was agreed in principle as part of the Gillespies work to provide these facilities on Earnshaw Street, Great Russell Street and further east on St Giles High Street. It should be noted that the transport assessment assigns these stands to specific routes, but TfL reserves the right to operate different routes from various stands depending on operational requirements.

However, due to both the revised location of the service access into Centrepont and the provision of an east-west pedestrian link through

Centrepont House, it is not possible to provide the four stands on Earnshaw Street that were initially proposed as part of the Gillespies scheme. To compensate for this, it is now proposed to provide an additional two bus stands on the northern side of St Giles High Street (east). However, such offside bus stands are not favoured by TfL as it could not operate as 'live' stands (where passengers disembark) given that this would involve passengers exiting the bus into the carriageway. As such, TfL would recommend that this option is not taken forward, and that investigation for additional bus standing further north on Earnshaw Street to maintain the proposed provision of 10 bus stands be rather considered. However, as outlined above, this would still require to be modelled to ensure that the traffic impact of such a stand would be acceptable to TfL.

At present the provision of bus standing on Great Russell Street has only been agreed by TfL in principle and an exact stand location is however still required to be agreed with LB Camden. This will be dependent on the direction of travel for buses in Great Russell Street which is proposed to be reversed as part of the Tottenham Court Road two-way scheme.

Public Realm Works

The application proposes a number of changes to the surrounding urban realm, building on the St Giles Circus urban realm scheme prepared by Gillespies, part of which is included within the recent submission under Schedule 7 of the Crossrail Act by TfL relating to the restoration scheme for St Giles Circus. Whilst TfL agrees that the Gillespies scheme holds merit in delivering improvements to the urban realm and pedestrian and notwithstanding the comments made on traffic and bus impacts, there are however some detailed points that need to be addressed through the application, as further detailed below.

Firstly, a number of security measures need to be included within any proposals for the public realm around Tottenham Court Station. TfL would welcome to meet with the applicant to discuss this in further detail. As these measures are a requirement of any works in the area, a condition requiring approval of a security scheme by both LB Camden and TfL prior to the commencement of any work should be secured through any planning permission. It should also be noted that the location of the layby that appears to be proposed on New Oxford Street on drawings CPA-19403 rev PL1 and CPA-19402 rev PL1 conflicts with some of the currently proposed security measures and this may need to be redesigned.

It is also noted that there are elements of the proposed urban realm scheme that are not consistent with the current designs contained within TfL's Schedule 7 submission. These include the omission of two feature lighting columns, including along Charing Cross Road and New Oxford Street, as well as differences in paving materials, tree locations and seating and lighting in the area to the east of Centrepont Tower. It is encouraged that a common approach to public realm improvements between Westminster City

and Camden Councils, the applicant and TfL can be agreed in the interests of expedience and to avoid unnecessary changes at a later date, while ensuring that a design can be delivered without impacting on the cost of programme of the Crossrail works. A scheme for wind mitigation immediately to the south of Centrepont Tower also needs to be developed and again should be secured by condition.

As the application proposes a large new area of public realm, and given the increase in short stay visitor trips associated with the improved retail offer in the area, it is considered that there is an excellent opportunity to allocate space within the new square for a cycle hire docking station. TfL would welcome the opportunity to discuss this further with the applicant and LB Camden.

Car Parking

For the 118 residential units, the application proposes a total of 36 car parking spaces. This equates to a ratio of 0.3 spaces per unit. Whilst TfL would prefer a car free development in recognition of the site's excellent PTAL, it is ultimately accepted that this level of car parking is in line with the standards set out in the London Plan policy 6.13. No car parking is proposed for the non-residential uses, which is supported.

Access to the basement car parking would be via car lift from Earnshaw Street, with an off street area provided for vehicles to wait without obstructing the adjacent bus stands or pedestrian crossing, which is welcomed by TfL. Residents would then be prevented from applying for parking permits in the surrounding Controlled Parking Zone (CPZ), which is supported and should be secured as part of the Section 106 agreement for the site.

The Transport Assessment makes no reference to either blue badge parking or electric vehicle charging points (EVCPs). In line with London Plan policy, 20% of parking spaces should be provided with an EVCP with an additional 20% passive provision for future use, and this should be secured via condition. The applicant should also confirm the proposed level of blue badge parking, having regard to the standards contained in the London Plan.

Trip Generation and Distribution

Sites within the TRAVL database have been used to determine the number of trips likely to be generated by both the existing use on site and the proposed development, with adjusted 2001 Census data then being used to allocate trips onto different modes, taking into account lower car use in connection with the retail uses for which there is no dedicated parking. This approach seems reasonable to TfL, and results in a reduction in the number of trips across most modes in both peak hours and across the day.

For the purposes of the assessment, a baseline date of 2018 has been used due to the difficulties in reflecting an accurate current baseline given the changing nature of the transport network around the site, caused primarily by

works to Tottenham Court Road station as mentioned above. Although this seems an appropriate approach to TfL, as detailed further below, it is currently understood that the applicant wishes to commence works in 2013, and the impact of this will need to be understood given the temporary highway layouts that will be in place at this time.

Walking and Cycling

Cycle parking for the residential units is proposed at basement level, in accordance with LB Camden's cycle parking standards. However, this results in a provision below the minimum London Plan standards, which require one space per unit for one or two bed units, and two spaces per unit for larger units. As such, residential cycle parking provision should be increased to a minimum of 147 spaces based on the proposed mix of residential units, in line with London Plan policy 6.13.

Cycle parking for the retail units is provided in accordance with London Plan standards, and would be a mix of basement parking for staff and surface level parking for visitors. Whilst this is welcomed the location of the surface level parking should be confirmed, as in some of the renders it appears to be proposed on the footway on New Oxford Street which could reduce the amount of footway space available for pedestrians.

Travel Plan

A draft Framework Travel Plan and Residential Travel Plan have been provided as an appendix to the transport assessment and will need to be secured as part of the section 106 agreement for the site. The Travel Plans have been assessed using the ATTrBuTe tool and their content is generally good – however, it should be noted that the retail Travel Plan appears to contain some references to the Victoria Circle development, which it is assumed is in error.

Construction and Servicing

Servicing is proposed using an off street service area accessed from Earnshaw Street, with service vehicles able to enter and exit the site in a forward gear. This represents an improvement over the current situation where larger vehicles often have to reverse to or from Earnshaw Street and as such is welcomed by TfL.

A draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have been provided as an appendix to the Transport Assessment. These are welcomed by TfL and should be secured as part of any consent for the site.

Both the draft DSP and CLP contain good information on the potential measures, targets and monitoring of the plans which will be taken forward once occupiers are known and the construction programme is further advanced. However, there are a number of issues relating to construction impact on the transport network which would need to be resolved before

works could be commenced.

Firstly, it is noted that the red line boundary submitted as part of this application includes areas of land that TfL own and / or currently occupy or use for the purpose of diverting Charing Cross Road. Appropriate agreements will need to be put in place in respect of such land.

As explained in further detail in the 'Highway Impact' section above, the impact of the proposed road closures during construction would need to be modelled to ensure that they do not result in unacceptable increases in journey times for both general traffic and for buses. In addition, provision of bus stand provision and parking and loading facilities would need to be agreed for each stage of construction, which may include relocation of bus standing and any impacts on existing bus stand due to scaffolding or other temporary changes. Any scaffolding will also need to be agreed with LU to ensure that its installation does not result in time, cost or safety implications for the current Tottenham Court Road works.

Traffic management measures will also need to be agreed with LU to ensure that they are co-ordinated with LU's programme and logistics plans for the works at Tottenham Court Road station. In particular, any works sites or loading areas for construction vehicles will need to be agreed to ensure that they do not impact on LU's construction logistics, including site vehicle movements and access and egress points. Equally, plans for pedestrian access around the site need to be agreed to ensure that there are no conflicts with station entrances.

In particular, there is a concern that Stage 2 of construction (currently estimated as November 2013 – March 2015) would conflict with the current LU programme for demolition of the existing station. At the latest this stage would need to be completed by December 2014, assuming that there is full coordination throughout 2014 to facilitate LU's top level works.

Finally, it is also noted that the existing Centre Point stairs are to be demolished as part of the development proposals. The timing of this demolition work needs to be discussed further with LU as it will impact upon their works on the new pavilions. The lease on the stairs is currently owned by LUL but could be passed back to the applicant provided that the stairs are removed in 2014 in order to facilitate their works.

S106 Contributions and Community Infrastructure Levy (CIL)

London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (July 2010) set out the mechanism for contributions towards Crossrail. The SPG states that contributions should be sought in respect of proposals for uplifts in floorspace for office, retail and hotel uses in central London where there is a cumulative uplift in such floorspace of more than 500sqm. This application proposes such an uplift but as the application also includes a change of use

from office to primarily residential use, given the floor areas involved in this instance no charge would be levied under the SPG.

However, notwithstanding the above the Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL and the development is located in the London Borough of Camden, where the charge is £50 per square metre. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

In summary, additional work on the highways impact of the closure of St Giles High Street needs to be undertaken for both the final state and the various stages of construction. Agreement on the relocation of bus stands also needs to be reached. Elements of the proposals for the public realm need to be agreed to ensure consistency with current London Underground proposals, and there are concerns over the current proposed construction arrangements. Finally, clarification is required on proposals for car and cycle parking provision.

In light of TfL's concerns, the applicant is strongly advised to meet with TfL as soon as possible, along with Westminster City and Camden Councils.

Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

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