



TfL Ref: CMDN/20/12

London Borough of Camden  
[planningpolicy@camden.gov.uk](mailto:planningpolicy@camden.gov.uk)

Transport for London  
City Planning  
5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

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Dear Sir/Madam,

## Re: Camden Site Allocations Review

*Please note that these comments represent the views of Transport for London (TfL) officers 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 matter. The comments are made by TfL with regard to its role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on Camden's draft site allocation review. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the [GLA website](#) – we will have regard to it when assessing and responding to local planning policy consultations, including Camden's draft site allocations review. We also note that the Mayor has received direction from the Secretary of State and is currently considering his response.

New development should be delivered in line with relevant draft London Plan policy and the aims set out in the Mayor's Transport Strategy (MTS). In particular, the approach taken at individual sites should reflect the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. We therefore strongly support site requirements and development guidelines that prioritise walking, cycling and using public transport in the location and design of new development and associated public realm. We will continue to work closely with

the Mayor and Camden to identify the improvements needed to support mode shift and growth. We will also continue to provide strong justification for investment in transport capacity and connectivity.

We welcome the support the document provides for walking and cycling, both through setting out Camden's overarching policy approach (including the requirement for car-free development) and through references to improving pedestrian and cycle permeability at most of the sites listed. Opportunities to support improvements in line with the Healthy Streets Approach should be taken as far as possible at all sites.

It is important that alongside improvements to walking and cycling, public transport is also supported. We would welcome references to the need for street improvements to also support bus operations including journey time and reliability. Where developments are located close to London Underground or London Overground infrastructure, these should not compromise the operation or necessary enhancement of these services. This may involve mitigation in the design of sites (for example to reduce the transmission of noise) or the restriction of certain development at certain sites. Similarly all proposals should avoid generating any negative impact on bus infrastructure including stops and stands.

Comments and suggestions relating to specific draft site allocations proposed are set out in more detail in the Appendix below.

Yours faithfully,

**Josephine Vos | Acting Manager**  
**London Plan and Planning Obligations team | City Planning**

[Redacted signature]



## Appendix: Comments from TfL on specific site allocations

### Knowledge Quarter Innovation District

- We generally support the proposals for the Knowledge Quarter, in particular policy h) which states that new development within the Knowledge Quarter district will need to 'contribute to relevant infrastructure improvements, including to pedestrian and cyclist movement within, around and across the Euston Road corridor'.
- We are currently progressing a Healthy Streets scheme for this location, and it will be important that developments in the area contribute if improvements are going to be delivered. Wording could potentially be expanded to explicitly cover contributions towards design development as well as implementation, and for developers to actively consider ways they could limit their impact on Euston Road e.g. through innovative servicing strategies which make use of consolidation centres or out of hours deliveries etc.

### Bloomsbury Campus

- We generally support the proposals being put forward, and the strong emphasis being put on improving walking and cycling connections and open space. In the context, we would question if there is any merit in expanding policy e) around delivering 'sustainable growth' to include specific measures around servicing. The area includes a number of major buildings which fall under a single landowner (UCL) so there is a question around there are opportunities to further limit their servicing impact such as by adopting collaborative and innovative approaches. This also has links to the 'Knowledge Quarter' policies, as making any radical changes to Euston Road in the future is likely to require a reduction in traffic, so nearby areas should be taking measures to help support this.
- Similarly, the document references improving east-west links and walking and cycling routes to integrate with the West End Project. While we support this, we would suggest there may also be merit in improving north-south links to Gordon Street (and beyond) in particular, given that the northern end is due to be pedestrianised under HS2 and there will be new and improved connections across Euston Road and into Euston station

### Camden Goods Yard area

- We generally support the transport related policies contained in CGY1 – new development should however also have regard to the impact they may have on nearby London Underground stations, namely Camden Town and Chalk Farm. While we support the introduction of measures to support walking and cycling, care should be taken to avoid any significant negative impacts on bus operations, including bus journey times and reliability.
- Policy CGY2 (g)- deliveries and servicing will remain important in the future if the site is to remain a supermarket. The policy could potentially be more explicit about the need to identify innovative ways to support such activities on-site. Buses provide an important form of public transport and their continued provision should be seen as integral to the re-development of the site. By 2020 all buses will meet or exceed Euro VI emission standards and by

2037 at the latest all buses within the M25 will be zero emission. As such, the impact from buses will naturally be lower in the future as they will be quieter and generate lower emissions.

- Policy CGY2 (h) refers to exploring the relocation of bus services. While we are open to discussion on this topic, we would want to avoid any disproportionate negative impacts, particularly for those reliant on a service to access work or those less physically mobile. Any proposed changes would need to meet customer demand, enable efficient interchange with other modes where relevant and have a minimal impact on bus operations and customer experience were they to be considered in detail. Any changes that would have a negative financial impact would need to be fully funded by the developer.
- Para- 5.41- The presence of suitably located bus-stands are essential for operating the bus network and we would object to any proposal to relocate/ remove any bus-stands without a suitable alternative location being agreed (in line with draft London Plan policy T3 Transport capacity, connectivity and safeguarding). It is also imperative that bus-stands are provided off-street wherever possible to provide greater security of tenure. Any increases to operating costs as result of bus-stands being re-located would need to be fully funded by the developer.
- Policy CGY5(f) and Para 5.76- Same comments as above (policy CGY2 (h) and Para 5.41) in relation to buses apply.

#### **Camley Street and St Pancras Way**

- Policy CSP1 c) – we support reference to new development contributing to new and improved pedestrian and cycle links. We recommend this is extended to also include reference to contributing towards bus improvements to support new development where necessary
- Policy CSP1 f) – we welcome proposals to minimise the servicing impact of new developments.

#### **Holborn and Covent Garden**

- Para 7.4- This paragraph will need to be updated to be in line with the new London Plan, which underwent its Examination in Public (EiP) last year and is nearing adoption. For example, Table 2.1 identifies indicative capacity at Tottenham Court Road for 300 homes and 6,000 jobs.
- We support the policies in HCG1, in particular (f) which seek contributions from new development towards a safe and attractive network of routes for pedestrians and cyclists. It also makes reference to reducing traffic dominance, however if this is to be achieved we would recommend that specific measures that developments are expected to deliver/contribute towards to support this are also referenced within the policy e.g. servicing initiatives
- We support the reference to the Liveable Neighbourhoods programme.

#### **Kentish Town**

- We are currently working with the London Borough of Camden to progress new strategic cycle routes, as set out in TfL's Cycling Action Plan (Dec 2018) and LB Camden's Cycling Action Plan (April 2019), including a number of routes that connect to Kentish Town and the surrounding area. To support the growing

cycle network serving Kentish Town, TfL recommends policy support for more cycle parking along the current and future cycle network, not only within developments but outside stations and other key destinations within Kentish Town. The area also plays an important role for industry/logistics, and it is important that Vision Zero is at the heart of providing new cycle routes to allow both cycling and industrial activity to take place safely.

- Other initiatives to improve cycling within Kentish Town that the document could consider are:
  - More location-specific interventions that help overcome severance for walking and cycling caused by major roads and railways, i.e. better crossings
  - Neighbourhood-scale traffic management, especially through local roads, to minimise through-movement by motorised traffic
  - Improving permeability on existing roads for cycling, e.g. more contraflows on one-way streets, gaps to permit cycle movement where there is no motor vehicle access
  - Exploring Cycle Streets, Play Streets and temporary closures for events, play, etc. These are ways of changing the balance between users and promoting active travel and a more diverse use of streets and public spaces in line with paragraphs J and K of policy D7 of the new draft London Plan (2019)
  - Policy KT5- any proposals which require the relocation of bus infrastructure (including bus shelters), will need to be done in consultation and agreement with TfL

### **West Hampstead interchange**

- Policy WHI - we generally support what is being proposed as the redevelopment of the land to the north side of the railway between West Hampstead and Finchley Road stations creates significant opportunities. With regard to WHI (j) and the potential to create step-free access, it should be noted that we have produced a feasibility report which focused on step-free access but also identified potential capacity enhancement measures and options for commercial development above and around an expanded ticket hall. As such, funding is needed to develop the scheme further and take it through to concept design. As such, we recommend the wording is enhanced, either here or under site specific policies to make clear the need for further design work as well as implementation.
- We welcome the reference in 9.8 to the need to explore step-free access at Finchley Road station and potentially other improvements via the adjacent O2 Centre. We do however wish to highlight that any works at this site would be difficult to implement owing to the curved nature of the station's platforms and high level of disruption that would be caused because of its crucial location on the Jubilee line. It is unclear why the building that is located between Finchley Road station and the O2 has not been included within the site boundary, given this currently presents a poor pedestrian environment
- There does not appear to be any reference to the development potential for the low-rise retail and commercial buildings on the southern side of Blackburn Road from its junction with West End Lane. This could be a key enabler for the

station improvements, as well as present an opportunity for joint development with TfL.

- Policy WHI2 (d) – we support increasing pedestrian and cyclist links between Finchley Road and West End Lane. As per our comments on ‘a new neighbourhood in West Hampstead’, we recommend that any improvements to this route be for pedestrians and cyclists only, to prevent any new route being used as a through route for vehicular traffic.
- Policy WHI3- As per our comments on ‘a new neighbourhood in West Hampstead’, any proposals for Blackburn Road should allow for the continued safeguarding of existing bus facilities, namely:
  - Two separate bus stops on Blackburn Road (one may be incorporated into a stand space)
  - Four stands which can be independently used by 12 metre buses
  - Driver toilets within a two minute walk of the stand and turning point for buses on the western end of Blackburn Road (as now)

#### **IDS6: Camden Town Station OSD**

- Paragraph 10.47 should make it clear that proposals are for a *station* capacity upgrade specifically.
- This site was acquired by TfL to be used as a main construction site (as well as deliveries) in order to be able to keep the existing station entrance open and minimise disruption during construction. We therefore suggest the following addition to paragraph 10.48: ‘It is envisaged to be used as the main construction site in order to be able to keep the existing station entrance open and minimise disruption during construction.’
- The possibility of sharing the site with the developer to bring forward the OSD can and should be looked at, so we suggest adding to the end of paragraph 10.49: ‘...unless a shared site agreement can be reached with the main contractor for the station box.’
- We would also add the following bullet points to Policy IDS6: ‘i. Ensure that the OSD does not compromise TfL’s existing, enhanced or additional infrastructure

#### **IDS19: Land to the rear of the British Library**

- This site falls within the Crossrail 2 safeguarding limits (March 2015). Liaison with Crossrail 2 should take place at an early stage as part of any development proposals for this site. We request that part j of the policy is replaced by the following wording: ‘Ensure the design of the development and public realm takes account the Crossrail 2 infrastructure requirements to deliver a design of exceptional quality.’