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Transport for London  
Borough Planning

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Dear Kiran

**Hybrid application for site known as Malt Street Regeneration Site, on land bounded by Bianca Road, Latona Road, Haymerle Road, Frensham Street and Malt Street, London SE1**

This letter is in response to your consultation letter dated 29 August in respect of the recent submission of the above planning application referenced 17/AP/2773.

We note that the application site is located on borough roads. However, the main vehicle access serving the site would be from borough highway which is in turn off the Old Kent Road, approximately 130m distant. As you are aware the Old Kent Road forms part of the Transport for London Road Network for which TfL is the highway authority.

The site has a PTAL of 3 over most of the site, meaning it has moderate public transport accessibility. Public transport accessibility is provided by bus services, primarily by five services from the “Malt Street” stops on Old Kent Road but also one further bus service on Peckham Park Road. There are no rail stations within reasonable (PTAL) walking distance of 960m.

We understand that the application has been referred to the Mayor of London and transport comments in the Stage 1 report to him will reflect the comments below. The contents of this letter relate solely to transport and do not prejudice any subsequent Mayoral planning decision.

**Walking, Cycling and Public Realm**

While the proposed development seeks to improve permeability through the site and extend existing routes into a more legible network of connections, the site is still in a land-locked location, meaning that connections into and through the site will not be fully legible and intuitive until the surrounding development

opportunity sites come forward. While a series of key routes are set up by the Malt Street regeneration masterplan, we need to give careful consideration to how people will access, move to and through the site in the short to medium term to ensure that routes and connections are safe, accessible and of sufficient quality to ensure that this site is well integrated into its surroundings. All routes within and through the site should be available at all times, i.e. with no night-time or other intermittent closure.

### Malt Street

This narrow corridor is proposed to be a 'cycle street' with section A-A (p90, DAS Vol 2) but seems a little narrow. Clarification of the available width would be welcomed.

Block B12 appears to be hard up against the defined carriageway area which, given that this route will need to accommodate refuse vehicles, emergency services and delivery vehicles, appears to provide insufficient protection for the building and its users.

Cycle surfaces should be smooth to ensure a high level of comfort for cyclists, with no longitudinal ridges or gullies which could affect balance and steering. We would recommend an applied surface treatment such as asphalt or bound gravel, however natural stone may be appropriate subject to the smoothness of the finish and the level of slip resistance.

### Surrey Canal Route

The proposed development responds to the aspiration in the draft AAP to reinstate the Surrey Canal Route as a linear park and route which runs through the heart of the site, which is welcomed.

Given that the central space will accommodate pedestrian and cycle movement only, lighting and animation of this space will be important to ensure it feels like a pleasant and safe place to use at all times of day or night – especially in the early phases of development.

The cycling route through the centre of the site is welcomed as an important, direct cycle connection between Burgess Park and Old Kent Road and beyond. The Applicant should demonstrate that there is not a risk of conflict between pedestrians and cyclists, i.e. while the proposals do not show any physical separation between pedestrians and cyclists, a change in surface treatment or

markings to define the cyclable area would help to ensure that the cycleway enables direct and unimpeded connections through the site.

#### Future connections

We would welcome a wider discussion with you about the future of adjacent sites, particularly Space Studios and Nye Wharf which obstruct the proposed alignment of the Surrey Canal Route. While it is appreciated that these sites are beyond the control of the applicant, the proposed route is not deliverable in its current form and as such, if these other sites are unlikely to come forward for development in the future this risks undermining the opportunity to deliver this important strategic connection.

#### Close connections to the site

There is potential for improvements and complementary works on routes close to the development in order to improve the public realm and walking environment. For example, the PERS audit identifies some locations where the footway is narrow. Additionally, there may be potential for tree planting on Malt Street to help to create a more pedestrian-friendly environment.

#### Wayfinding

The commitment to provide wayfinding through use of Legible London signs throughout the site is welcomed. However given the likely changes in the area over the coming years, allowance should be made for updating thereby helping to “join up” the pedestrian and cycle routes in the area. In addition this should be complemented by provision within the immediate vicinity of the site (e.g. at the bus stops, Burgess Park and local shops and services) .This should be secured by condition with a s106 obligation payable to Southwark for off-site costs.

#### Cycling

The CLOS analysis is welcomed and the choice of routes is supported, although there is a case for taking Route 5 beyond South Bermondsey Station as trips to Canada Water and to Greenland Dock Riverbus pier (for Canary Wharf, the City and Central London) and the proposed Rotherhithe to Canary Wharf bridge.

While our assessment has not examined every element of the CLOS assessment, it is noted that on Route 5 the score for a segregated route has been awarded when this only applies to less than half of the limited length assessed. You will be aware that there is no “pass mark” for CLOS. Instead it

is used to highlight deficiencies which can help direct the application of funds. There is scope for significant improvement on the route to South Bermondsey Station and beyond to Greenland Dock, and we request funding for a study into, and contribution toward implementation of, cycling infrastructure improvements on this route within the Old Kent Road Opportunity Area. Such improvements would not only encourage active travel but help address the limited public transport links immediately serving the site.

Route 6 covers the route to the proposed New Bermondsey Station on Surrey Canal Road, which would be a similar distance from the site as South Bermondsey and is also the closest point for cyclists to join Quietway 1 going to or from the east. This has the lowest overall score of all the routes assessed and so, again, we request funding for a study into, and contribution toward implementation of, cycling infrastructure improvements on this route within the Old Kent Road Opportunity Area

### **Cycle Parking**

Basement cycle parking seems to be provided in two blocks, close to the core of buildings B4 and B10. Access to B9 is via stairs (only) to the southeast corner of the basement. We consider that lift access should be provided to block B9 for both cyclists and disabled drivers. Furthermore, access to B9 cycle parking involves walking across the car park which is not ideal.

While not specified, the cycle parking in the basement seems to be provided solely in stacking racks. Such racks are usually suitable for able-bodied adults, but cannot accommodate children's bikes or any non-conventional bikes (for example tricycles, cargo bikes and bike trailers). Further, use of the top racks can be difficult for those that are not strong enough to lift a bike, but use of the lower racks can often cause difficulty due to the need to bend over and hold that position while locking or unlocking the bike. Therefore a good proportion of standard "Sheffield" stands should be provided, perhaps with signs asking that they be reserved for those less able to use the stacking racks.

The aisle widths between the stacking racks does not appear to be acceptable, with less than a bike-length between racks. When using the upper rack, suitable width is required to lower the rack and then position a bike on the floor straight-on to the rack. Otherwise users will have to push the front wheel up the rack while the rest of the bike is at an angle, a movement which most able-bodied cyclists would find difficult. The applicant should revise the proposals to

incorporate sufficient space for the racks, and provide sufficient technical detail to demonstrate that the space is sufficient.

Access to the cycle parking areas within the basement is poor, with users expected to wheel their bikes along narrow corridors (consider the need to provide for tricycles, cargo bikes and bike trailers) and turn a corner within that space. Assuming some form of security on the entrance to the car park (CCTV) it would be appropriate to have direct access from the car park into the cycle parking areas or, at the very least, widening of corridors, removal of doors and widening of openings to the cycle parking.

The plans indicate a contiguous bored pile wall system for the basement. The developer should be asked to indicate how this would be amended to extend the basement to provide additional cycle parking required for Phases 2 and 3 of the development.

The quantum of surface-level cycle parking spaces for visitors seems to be adequate for residents' visitors. Some seem to be oversailed by buildings and therefore afforded some protection from the weather, while others are not. There seems to be an opportunity, which should be taken, to relocate the cycle parking near block B4 to a location under the building overhang. The plans do not seem to indicate any visitor cycle parking close to block B10, which should be provided in a location protected from the elements.

The quantum of cycle parking for commercial uses seems to be adequate to meet the proposed mix of uses. However, there is no indication of where those spaces are. The applicant should be asked to provide more detail over how space will be reserved for covered and secure cycle parking for workers, and how and where visitor cycle parking will be provided for those uses.

In order to improve the accessibility to the development by bicycle, we request that the Mayor's cycle hire scheme is supported in the following ways:

- Safeguarding of land for a 30-dock cycle hire station (28m long and 2m wide), with free access at any time, within and close to the development boundary (or nearby on land separately secured if on-site provision is not possible) and close to a loading bay or other safe and convenient space from which cycles can be loaded to or from a lorry.
- Funding of £220,000 toward the capital (£110,000) and operational costs (£110,000) of the docking station.

Given the distance to the nearest stations, improvement of cycle parking at those stations would improve their accessibility to residents of the site. A contribution toward that, commensurate with the size of the development, is requested.

### **Car parking**

We welcome the proposal of a low-car development with a ratio of 0.12 parking spaces per residential unit, given the relatively accessible nature of the site and potential significant accessibility improvement to accessibility on construction of the Bakerloo Line Extension. This is supported by the permit-free status that is assumed in the S106 Heads of Terms. While policy-compliant, given the rapid increase in sales of electric vehicles over the last few years we would encourage the provision of electric vehicle charging points at a much higher proportion of spaces than are proposed.

In regards to parking provision for disabled residents and visitors, we cannot endorse the very low level proposed. The London Plan, misquoted in the TA, requires that “Adequate parking spaces for disabled people must be provided preferably on-site”. A total of seven parking places are proposed to be reserved for Blue Badge holders. Given that to comply with London Plan policy there will be in the order of 105 units which are wheel-chair accessible or capable of adaptation to that standard, it is not unreasonable to expect roughly the same number of households with residents who have considerable difficulty walking. While great steps have been taken in the last 20 years in improving accessibility of public transport services, they still present a barrier to movement for many disabled people. Provision of a parking space for under 7% of accessible units and less than 1% of all households cannot be considered “adequate” as required by the London Plan, especially in the absence of any specific justification, and this should be considered a reason for refusal.

The London Plan recommends that “Applicants for planning permission should use their transport assessment and access statement to demonstrate how the needs of disabled people have been addressed.” The TA makes no attempt to do so. The common assumption is that parking spaces for disabled residents should be provided in the same number as wheelchair-accessible units.<sup>1</sup> This

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<sup>1</sup> Though not assigned to those units: there will be many disabled people in wheelchair-accessible units who do not wish to own a car, while there will be other disabled people in conventional units who do not require a wheelchair-accessible unit but do wish or need to use a car. The specific allocation of disabled parking places to wheelchair-accessible units only

should be taken as the starting assumption with any reduction fully justified based on evidence from comparable developments.

The proposed Car Park Management Plan (CPMP) should include a methodology for determining the demand for disabled parking and ensuring that it is met, including if necessary by converting conventional parking spaces to accessible spaces. We would be welcome consultation on the CPMP that you secure through condition or obligation.

The applicant should also demonstrate arrangements for the pick-up and drop-off of people at the site and in particular those with mobility difficulties and by taxi and pre booked private hire vehicle.

### **Trip Generation, Mode Split, Distribution and Assignment**

This analysis is very poorly set out, stretching across two sections of the TA (6 and 7), with conclusions over the impact of the development's trips made before distribution and assignment are considered.

Trip generation has been carried out using TRICS and seems to be acceptable. Mode split seems to be based on the 2011 Census for Southwark as a whole and is therefore not representative of this site. Data for this Livesey, South Bermondsey and Peckham Wards are expected to be much more representative. The method for developing the mode split estimates in Table 6.6 are not explained and seem to bear no relationship to the census data. Distribution and assignment of trips are similarly poorly evidenced and explained.

Given the poor analysis of mode split, distribution and assignment, we cannot rely on the output figures presented in the TA and subsequent analysis therein. It will be necessary to revise these elements of the TA in order for us to fully assess the impact of the proposed development on transport networks in this area.

Notwithstanding the above, the following comments are made "without prejudice" to assist in the revision of the TA.

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also allows for able-bodied people to purchase wheelchair-accessible units purely for access to parking where this would otherwise not be available, thus reducing the quantum of wheelchair-accessible units available for disabled people. Instead, disabled parking places should be assigned to disabled people as the need arises. This should form part of the proposed Car Park Management Plan.

Rail and London Underground access for this development is poor (no rail stations within the 960m/12-minute walk used in PTAL calculations). Therefore it is unlikely that any trips will directly access rail stations (i.e. it can be expected that residents will instead take the bus to stations). Consequently a much higher mode share for buses can be anticipated than is set out in the TA.

Further, given the relatively low service frequency from South Bermondsey and Queens Road Peckham, it is more likely that residents will take a bus to Elephant & Castle to access the much more frequent Bakerloo Line, Northern Line and National Rail services there.

A nominal distribution of bus trips is set out in paragraph 7.6 before any discussion of data related to bus trip distribution set out in tables 7.2 and 7.3. Those tables clearly contradict the assumption in paragraph 7.6 that bus trips should be distributed evenly between services and between directions. Tables 7.2 and 7.3 omit the City of London as a destination, though this did seem to be included in a working paper submitted in September 2016. However, the tables clearly show that other Central London boroughs (Westminster and Camden) attract a high number of trips. More detailed geographical analysis of trips assigned to Southwark (as requested in Andrew Hiley's email of 27 September 2016) and Lambeth can reasonably be expected to be heavily skewed towards areas of those boroughs within the Central Activities Zone. Trips to many other boroughs are likely to route through Central London.

Consequently it is reasonable to assume that the vast majority of bus trips, and a large proportion of bus trips accessing rail modes, would be attracted towards Central London. Given that the Old Kent Road bus stops offer the most frequent combination of services toward Central London, it can be expected that the majority of bus trips would be attracted to the northbound "Malt Street" stop.

### **Bus Impacts**

The revised mode split, distribution and assignment requested will be considered by colleagues in Bus Network Development to consider the mitigation measures required to make the development acceptable in this respect. The following comments are provided on a "without prejudice" basis in order to give an "order of magnitude" indication.

The above discussion about the distribution and assignment of bus trips gives rise to the following estimation which is considered more likely and realistic than that set out in the TA: assuming 75% of all bus and rail trips (288 passengers per hour) are assigned to northbound bus services at the Malt Street stop on Old Kent Road, with a service frequency of approximately 45 buses per hour, equates to 6.4 passengers per bus.

Bus services are both heavily subscribed at this point, such that it is unlikely that new passengers will be able to board, and heavily delayed by congestion. Consequently we consider it will be appropriate to ask for contributions as follows:

- A contribution commensurate with the addition of 4 buses to the peak vehicle requirement (based on a planning capacity of 70 passengers per bus) in order to enhance bus service frequencies to accommodate the additional passengers generated by the development in the morning peak period. One bus added to the peak vehicle requirement for an all-day route currently averages £250,000 per year. Annual contributions are requested for a five-year period.
- A contribution, proportionate to the reliance of the scheme upon bus services on Old Kent Road, toward a scheme under development to enhance bus reliability and journey time on Old Kent Road close to the site, in order to improve bus journey times and reliability.

We consider that a request for contributions, when better defined following revision of the TA, will meet the tests for the use of planning obligations, specifically that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

### **Rail Impacts**

The above acknowledges that rail trips arising from the development are most likely to use services at Elephant & Castle. Frequencies at that location are such that additional passengers per train are negligible and therefore no discernible impact is anticipated. Small numbers may use South Bermondsey and Queens Road (Peckham) stations. The use of these stations could be increased through improvements to walking, cycling and bus links to the site albeit that we would as stated above expect the vast majority of people to use Elephant & Castle.

The development site would benefit from the proposed Bakerloo Line Extension (BLE), but the earliest this could be delivered, subject to funding being available, would be 2029-2030 and so reliance must be on buses, walking and cycling until the BLE opens. Thus it can be expected that all of this development will be occupied and placing demand on an already overcrowded transport system ahead of BLE, and therefore appropriate mitigation is required to meet this demand without reliance upon the BLE.

Whilst assessment is underway currently it is expected that there would be no direct conflict between the development and potential sites for BLE stations, vent shafts or other surface infrastructure. However, it is possible that the tunnel may go under the site. Consequently, deep foundations (greater than 15m below surface) may have an impact. To avoid conflict, we request that TfL is consulted formally on the location and nature of any foundations greater than 15m below the current ground level, secured by condition or obligation as appropriate. In addition it is possible that a station or other works may be located nearby and accordingly we would suggest that suitable noise and associated mitigation measures are incorporated into the detailed design of the development and secured by condition.

### **Travel Plan**

An outline travel plan has been produced for both the commercial and residential elements of the development, which is welcomed. However, we believe that the five year targets set in each of the travel plans should be more aspirational in terms of cycling and walking mode share, and a reduction in car use should be sought. This would accord much better with the Mayor's objectives in respect of active travel and reducing car use.

The measures in the travel plan are welcomed, particularly the offer of personalised travel planning for residents and workers. However, this is "if requested": we would prefer that there was a more proactive approach to offering this service. We would also expect the provision of assistance to workplaces to provide travel advice to their visitors. It should focus on encouraging active travel as well as use of public transport, and should also consider travel demand management especially in the peaks.

We also request that the applicant should provide each resident and worker with free access to cycle hire as a measure to support the site's travel plan.

## **Deliveries and Servicing**

A draft Delivery and Servicing Plan (DSP) has been provided, which is welcomed. It sets out the provision for loading and demonstrates that the proposed provision has sufficient capacity for the demand likely to be placed upon it.

However, it is not clear where the proposed loading bays are. Their location should be clarified so that the interaction with pedestrians and cyclists and upon the public realm can be considered.

It is suggested that the DSP is amended to include consideration of avoiding the traditional morning and evening peak periods, and of the use of load consolidation. Both initiatives would have the effect of reducing road traffic and, more importantly, the number of freight vehicles encroaching into the public realm at its busiest times. Additionally, an improved concierge service or provision of lockers for larger deliveries to residents would increase flexibility for residents and help avoid peak times.

## **Construction**

As advised in our pre-application guidance, a Construction Logistics Plan (CLP) should have been provided with the application. The TA refers to the submission of a draft Construction Environmental Management Plan but this does not appear in the application documents on Southwark's website.

Since no plan was available for assessment, it is requested that provision of a plan acceptable to TfL and the Council is secured by condition. The CLP should meet our guidance<sup>2</sup>, setting out ways in which the adverse impact of construction vehicle movements will be mitigated. That condition should be discharged before implementation of any permission which might be granted.

Please contact me if you have any queries relating to this correspondence.

Yours sincerely

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<sup>2</sup> <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>

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