

18/AP/3551 Southernwood Retail Park, 2 Humphrey Street □ TfL Consultation response

From : Michael Welch

Date : 1st May 2019

Dear Tom,

TfL has the following comments and objections regarding the above Planning Application. The main points are summarised below with more detail in the remainder of the document.

Strategic approach to Transport (DLP Policy T1) □ Summary and remedy

The lack of a Masterplan for this part of the OKR area which has been agreed by all parties will lead to piecemeal and un-co-ordinated development which risks key transport and design and development objectives not being delivered. TfL considers such an approach should be adopted as opposed to position currently whereby the applicant and Tesco/Invesco are each putting forward their own proposals for the sub area which do not co-ordinate. We are concerned that approval of the Southernwood scheme as submitted will constrain other development and the delivery of transport and other key infrastructure.

If a hotel is to be provided in the OKR 4 area it should be provided in phase 2 once the Town Centre has been established and designed and located in a way that enables its transport functions to operate acceptably.

Transport capacity, connectivity & safeguarding (DLP Policy T3) - Summary & remedy

The hotel proposals as they currently stand, together with the need for further detailed work and potential BLE construction requirements mean that there is not currently adequate safeguarding for the BLE. As detailed in the stage 1 GLA report this is contrary to London Plan Policies 6.1, 6.2 and 6.4, Proposal 85 of the Mayor's Transport Strategy and Policies GG2, GG5, SD1, T1 and T3 of the draft London Plan.

The Council are strongly urged to allow only the rear portion of the site to proceed ahead of the BLE being completed to avoid the issues outlined above and set out in the BLE team's detailed response sent to you on the 29th. The full response from our BLE team is appended to this report.

Healthy Streets (DLP Policy T2) - Summary and remedy

Our previously stated concerns regarding the adequacy of parts of the pedestrian network remain, particularly with the pinch point on the corner of Humphrey Street and Old Kent Road.

Setting back or relocating the staircase on the corner of the hotel would make more land available for the necessary public realm required to support the surrounding Old Kent Road developments and transport infrastructure. We would request that the applicant consider this as well as providing the previously requested analysis to demonstrate adequate footway widths to meet the needs of the wider area as well as the development itself.

Cycling (DLP Policy T5) - Summary and remedy

The proposed cycle parking arrangements do not comply with at least the minimum levels required by Policy T5 of the draft London Plan, and changes are also required to ensure

London Cycling Design Standards (LCDS) are met, there are also issues with the placement away from the main residential cores.

Remedy: Before determination the design should be amended to reflect policy and guidance, as subsequently it will be too late, clarity should be provided as to where the public realm cycle parking would be located.

Car Parking (DLP Policies T6.1-T6.5) - Summary and remedy

The proposals for the hotel present a number of issues that make them non-compliant with Policies T6.1-T6.5 and a Car Parking Management Plan has not been provided.

Design changes are required to the hotel's access arrangements to

- Enable the safe and efficient operation of pick up and set down by taxis and other vehicles.
- Enable continuous provision of Blue Badge parking for the hotel
- Accommodate or manage the needs of coaches given the lack of facilities in the surrounding area and on site.

To accommodate the above it is recommended that the hotel is provided on another part of the site where its access requirements can be fully included from the outset. We consider unlikely that the significant design changes and stringent management measures necessary to make the existing proposals workable can be made to address the issues set out above and those elsewhere in these comments.

When considering future access arrangements for all modes for the Old Kent Road and Humphrey Street frontages the Vision Zero and Healthy Streets approaches should form part of the design process at an early stage. There should be no use for vehicular access activities other than to continue to serve the existing retail warehousing.

A Car Parking Design and Management Plan should be provided and agreed.

Deliveries, servicing and construction (DLP Policy T7) - Summary and remedy

TfL considers the application proposals to be poorly designed and supported with insufficient information to demonstrate their workability. As such we consider the proposals and their supporting Delivery and Servicing Plan unacceptable and contrary to draft London Plan Policy T7.

The basic problems stem from the sub-division of the phase 2 plot which creates a small and constrained plot for the proposed hotel development. Whenever it (or anything else) is delivered on this part of the site there will be issues of vehicular activity conflicting with increased pedestrian flows and the emerging Healthy Streets scheme which is necessary to deliver pre-BLE transport improvements. As mentioned above there are also considerable issues arising for BLE from the development of this land, especially as part of phase 1.

Accordingly we would suggest reconfiguring the Masterplan and placing the hotel in a different part of the site where adequate access for taxi and coach traffic and continuous on-site servicing could be designed in. This would remove many of the above problems and allow the hotel to function properly making it a more attractive offering.

We would reiterate our pre-application advice and policy requirements that a robust and evidenced DSP and outline Construction Logistic Plan should be prepared to support the application. This should explain how Rowcross Street in-particular will be affected.

Transport Assessment (DLP Policy T4) - Summary and remedy

Due to the multiple issues with the Transport Assessment it is not currently considered fit for assessment purposes and therefore contrary to Policy T4. As well as the methodological issues there are errors in the text and many references to documentation or data that is not present or has not been made available.

Further work will therefore be required to demonstrate that all elements of the development trip generation and mode split are robust and that the public transport network, active travel provision and that for taxis will be able to cope with the demands. Work on the hotel is particularly important given its on phase 2 post BLE commitment land and thus where additional high peak time trip generating uses would not be accepted ahead of this.

This section of the report provides the detail supporting the above summaries.

Summary

TfL objects to the current proposals as they do not fully comply with the London Plan as indicated in the sections below.

Policy No.	Compliant ?	Remedy
Strategic approach to Transport (DLP Policy T1)	No	Masterplan required
Healthy Streets (DLP Policy T2)	No	Design change
Transport capacity, connectivity & safeguarding (DLP Policy T3)	No	Change to application and/or design
Transport Assessment (DLP Policy T4)	No	Further work required
Cycling (DLP Policy T5)	No	Design change
Car Parking (DLP Polices T6.1-T6.5)	No	Design change
Deliveries, servicing and construction (DLP Policy T7)	No	Design change
Funding transport infrastructure through planning (DLP Policy T9)	Tbc	s106, s278 tbc

	Compliant / No comments
	Further work required to make complaint
	Major changes / re-design required to make compliant

Strategic approach to Transport (DLP Policy T1)	Non-compliant	Masterplan required
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TfL is very concerned that there does not seem to be a joined-up approach to the development of all three sites within the OKR 4 area, particularly as discussions about the BLE station, construction works and bus infrastructure requirements are still ongoing.

The OKR AAP advocates that the current gyratory system should be removed. It also proposes closure of Humphrey Street. However the submitted Design and Access Statement contains illustrative proposals showing Humphrey Street being narrowed, with relocated and reduced bus stops and standing.

However whilst Humphrey Street is borough highway its future function and design has a fundamental impact upon the TLRN and upon bus infrastructure and operations, along with a relationship to BLE. To date there has been only limited discussion about the gyratory and Humphrey Street and we would strongly suggest these are now progressed to achieve an optimal solution for this part of the OKR OA. Pending the resolution of these issues the application scheme must assume the lay out as is.

As noted above our understanding is that there are at least two conflicting developer visions for this sub area, one put forward by the applicant and another by Tesco/Invesco. The Council's aspirations are different again. Any approval of the application scheme will foreclose options for both the Tesco site and BLE.

Whilst it is realised that the existing shop unit on the corner of Rowcross Street is not in the applicant's ownership, its exclusion from the site further constrains development opportunities and impacts on the delivery of a good transport solution in terms of Healthy Streets and Vision Zero approaches and many policies in the draft London Plan.

Therefore, TfL considers that a more comprehensive masterplan coordinating development in this part of the OKR would be appropriate and bring significant benefits when compared with the outcome if the current piecemeal developments are followed through. This would ensure, inter alia, that the wider transport design and urban realm interests are improved through the planning process and do not result in lost opportunities or degradation.

The strategic location and accessibility requirements for a hotel will only be met once the BLE opens. These are not just planning policy but will contribute to the achievement (or not) of a viable and sustainable development. As detailed in T4, T6 and T7 there are also unresolved parking and servicing issues which underpin its implementation, some of which would be resolved if the hotel was in a different part of the site and delivered in phase 2.

Unless or until evidence is provided to the contrary TfL objects to the development of a hotel on this site as part of in phase 1 and suggest it is relocated elsewhere in the site to make it more operationally accessible.

Summary and remedy

The lack of a Masterplan for this part of the OKR area which has been agreed by all parties will lead to piecemeal and un-co-ordinated development which risks key transport and design and development objectives not being delivered. TfL considers such an approach should be adopted as opposed to position currently whereby the applicant and Tesco/Invesco are each putting forward their own proposals for the sub area which do not co-ordinate. We are concerned that approval of the Southernwood scheme as submitted will constrain other development and the delivery of transport and other key infrastructure.

If a hotel is to be provided in the OKR 4 area it should be provided in phase 2 once the Town Centre has been established and designed and located in a way that enables its transport functions to operate acceptably.

Healthy Streets (DLP Policy T2)	Non-compliant	Design changes required
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The Walking and Public Realm section of our pre-application response highlighted our serious concerns about the Old Kent Road and Humphrey Street frontages, and the need for a minimum 4m footway to cater for the demands which will arise from pedestrians in this area from those associated with the application development but also from a location within what the Council intends to be a town centre and in a part of the OKR where draft and emerging planning policy promotes significant new development.

The BLE station is forecast to attract around 4000 people in the peak hour which will require adequate public realm around the station and its nearby buildings as noted in the Stage 1 report which also raises urban design issues.

Our pre-application response requested analysis that covered the built out OKR proposals and demonstrated that the footways can accommodate these levels of demand. This requested analysis has not been undertaken, and the original footway widths remain as do our previously stated concerns. Whilst welcoming the applicant's stated intention to work with TfL to deliver the necessary land if the current proposals are approved it is not obvious how or what will be deliverable to meet the needs of pedestrians let alone any urban design and public realm aspirations

Without the ability to deliver a wider footpath at this location there would be significant challenges to the delivery of TfL's Healthy Streets Scheme for the Old Kent Road, in particular the ability to provide both the proposed cycle and bus lane at this location. This in turn would mean that the delivery of improved provision for active and bus travel necessary to support the phase 1 development of the site and that in phase 2 occupied before BLE is completed cannot be achieved. This will result in the occupiers and visitors to this car free scheme having to contend with walking and cycling provision which is insufficient to meet needs and in some cases not safe and also with delays and therefore further crowding on already overcrowded buses.

Healthy Streets / Pedestrian Analysis

Para 4.13 of the TA references pedestrian network flows being presented in figures 4.3 to 4.7, none of which are available for viewing within the document. Without being able to see these figures it is not possible to know whether the total pedestrian movements match those presented in Table 9.10 or how people are expected to move about the site. From the information provided it is noted that there are no development flows expected on the Humphrey Street links which seems unlikely.

Footways need to be able to accommodate all of the demands that are going to be placed upon them by all of the surrounding developments put forward in draft and emerging Council planning policy and in line with the London Plan Opportunity Area designation, not just this specific one. It is also not credible or acceptable to be ignoring the proposed BLE station nearby and indeed elsewhere in the submission much is made of the improvements in public transport this extension would bring.

The entry and exit points of the OKR frontage link are 2.8 metres in width at each end which is not adequate for the reasons stated above for instead 4m minimum footway width. It is also evident that the other proposed usages or activities in this area will further reduce the effective footway width. These include the proposed taxi pickup and set downs on OKR or Humphrey Street, as result of the intended route between the hotel and Rowcross Street for servicing the hotel during phase 2 construction and for people going to/from coaches and private hire and other vehicles picking up and setting down in this street, being the only one close to the hotel without significant restrictions. None of these are acceptable to TfL but nonetheless they form part of the current proposals either explicitly or by implication.

The plans also show the placement of table and chairs outside hotel frontage (which would require a licence from Southwark if on adopted land). This would reduce the effective width of the footway especially when in use and if people start to congregate in this area

It is not clear which parts of the cycling network are being reviewed in the CLOS, and there do not seem to be any proposals to improve the identified deficiencies or for the surrounding pedestrian and cycling networks as a whole. These should be addressed and proposals made for their improvement.

Summary and remedy

Our previously stated concerns regarding the adequacy of parts of the pedestrian network remain, particularly with the pinch point on the corner of Humphrey Street and Old Kent Road.

Setting back or relocating the staircase on the corner of the Hotel would make more land available for the necessary public realm required to support the surrounding Old Kent Road developments and transport infrastructure. We would request that the applicant consider this as well as providing the previously requested analysis to demonstrate adequate footway widths.

Transport capacity, connectivity and safeguarding (DLP Policy T3)	Non-compliant	Change to application and/or design
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A detailed response to the proposals has been sent separately by the BLE Team who consider that issues remain with the hotel piling, the potential station box and the apparent assumptions for the phase 2 proposals. In addition, TfL cannot rule out the need for further land to support construction and operation of the station. There are also the unforeseeable risks to delivery of the BLE arising from development in particular of the hotel and phase 2 and the occupation of the development during BLE works.

To ensure that there are no temporary or permanent structures in the exclusion zone be it in the phase 1 or 2 development and to address the other concerns set out above, TfL considers that the hotel and phase 2 development should be built to designs which are compatible with the BLE detailed design once it has been confirmed and that occupation takes place to accord with the BLE delivery programme. Therefore at this stage approval should not be given to the relevant details. In any circumstance a s106 obligation should be placed on any permission for BLE safeguarding and that TfL are a party to the agreement to enable it to be fully involved in the consideration of the details and can enforce if necessary itself.

Summary and remedy

The hotel proposals as they currently stand, together with the need for further detailed work and potential BLE construction requirements mean that there is not currently adequate safeguarding for the BLE. As detailed in the stage 1

GLA report this is contrary to London Plan Policies 6.1, 6.2 and 6.4, Proposal 85 of the Mayor's Transport Strategy and Policies GG2, GG5, SD1, T1 and T3 of the draft London Plan.

The Council are strongly urged to allow only the rear portion of the site to proceed ahead of the BLE being completed to avoid the issues outlined above and in the BLE team's detailed response.

Transport Assessment (DLP Policy T4)	Non-compliant	Further work required
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In accordance with Policy T4, further work is required to rectify issues with the submitted trip generation and modal split. However, TfL has been able to make some assessment of the transport impact of the development and thus necessary mitigation by reference to data supplied in support of other applications on the OKR and its own strategic modelling.

There are issues with the site selections and methodology associated with the Trip generation for all of the land uses and servicing. The selected sites should be London Based, relevant and comparable to the proposed development and no more than 5 years old.

Surveys intended for incorporation should be approved by TfL before being undertaken and their results made available for scrutiny. There are a number of instances where it is not possible to find material referenced in the main text of the TA.

Residential Trip Generation

Our pre-application response flagged up TfL's concerns that the trip rates were on the low side and requested the component sites were listed. The technical appendices containing these were not originally made available for consultation, when finally made available they revealed that the following sites had been used.

Southernwood - Appendix J Selected residential TRICS sites

CB-03-C-01	BLOCK OF FLATS	CARLISLE	40	12/06/2014
EX-03-C-01	FLATS ESSEX	SOUTHEND-ON-SEA	6	22/10/2013
EX-03-C-02	BLOCK OF FLATS	SOUTHEND-ON-SEA	94	22/10/2013
GM-03-C-02	BLOCK OF FLATS	MANCHESTER	154	13/10/2011
GM-03-C-03	BLOCK OF FLATS	MANCHESTER	20	14/10/2011
HM-03-C-01	BLOCK OF FLATS	FULHAM	42	16/07/2014
HO-03-C-02	BLOCK OF FLATS	BRENTFORD	86	03/09/2014
HO-03-C-03	BLOCKS OF FLATS	BRENTFORD	150	18/11/2016
IS-03-C-04	BLOCK OF FLATS	ISLINGTON	157	14/07/2016
KI-03-C-02	BLOCK OF FLATS	KINGSTON UPON THAMES	132	14/06/2010
KI-03-C-03	BLOCK OF FLATS	SURBITON	20	11/07/2016
KN-03-C-02	BLOCK OF FLATS	SOUTH KENSINGTON	294	15/06/2010

KN-03-C-03	BLOCK OF FLATS	KENSINGTON	72	11/05/2012
NF-03-C-01	BLOCKS OF FLATS	KING'S LYNN	51	11/12/2014
SF-03-C-01	BLOCKS OF FLATS	BURY ST EDMUNDS	85	18/12/2014
SK-03-C-01	BLOCK OF FLATS	SOUTHWARK	53	19/09/2014
WH-03-C-01	BLOCKS OF FLATS	CLAPHAM JUNCTION	30	09/05/2012

Inspection of TRICS indicates that there are 19 London sites within 5 years old that should have been considered as a more up to date source of information. There is also no reason to use data from sites outside London. We have highlighted the sites which should be removed from the list for one or both reasons. Furthermore given the size of the development the use of sites with less than 100 units is particularly concerning.

Rather than source more up to date sites from TRICS the applicant has created a list of other Southwark applications (table 9.5), compared their average rates to appendix J and concluded that the average rates were comparable. The quoted average was a straight average rather than the 85th percentile which would have generated a higher and more representative value.

Notwithstanding this to investigate their suitability TfL undertook a random spot check of the listed sites in Table 9.5 was undertaken and focused on a site with very low trip rates. The TA for 13/AP/0065 was also undertaken by Motion and was for an application of 158 residential and 4395sqm of education use. As the application itself is more than 5 years old it is not surprising that all of the selected sites are now more than 5 years old. The oldest site dated back to 2002, and 10 of the 16 sites are for less than 70 units. Due to the lack of their suitability a weighted average process was established to generate the values in the TA.

The presented residential trip making appears to be based on two sets of unsuitable data being broadly consistent with each other. In addition to this there does not seem to have been any regard given to what is in each of the individual applications. For these reasons TfL does not consider the residential trip generation to be robust. This undermines the acceptability of other parts of the TA and elements of the proposals which have been informed by this analysis. We therefore consider that unless or until more realistic trip generation for the housing has been undertaken it is not possible to properly assess impacts and thus enable determination of the application.

Retail Trip Generation

Retail trip generation for the units being retained during phase 1 should be based on surveys of the existing units, the remaining retail appears to be based on the following site

GS-01-K-02 RETAIL PARK GLOUCESTER GFA: 8687 sqm 28/11/13

The site is both out of date and not in London and so unsuitable. It would also appear not to be town centre retail but instead another retail park similar to that currently on the site.

Cinema Trip Generation

A site in the West Midland has been chosen as no sites were available in TRICS. We would draw the applicant's attention to the Enfield site with a survey date of 29/11/2017 which might be more geographically relevant.

Hotel Trip Generation

When using TRICS TfL guidance requires the use of surveys of comparable sites and developments which generally should be no more than 5 years old, or surveys to establish up to date information, the table below summarises the basis of the data contained in the TA

Site	Name	Location	Bedrooms	S. Date
CB-06-A-01	HOTEL CUMBRIA	CARLISLE	9 bed	20/06/2016
DS-06-A-02	JURY'S INN	DERBY	213 bed	19/07/2011
GM-06-A-08	IBIS	MANCHESTER	127 bed	26/09/2016
GR-06-A-03	NOVOTEL	GREENWICH	151 bed	22/11/2013
HO-06-A-01	DAYS HOTEL	HOUNSLOW	96 bed	16/06/2010
HO-06-A-02	ETAP HOTEL	HOUNSLOW	148 bed	16/06/2010
NT-06-A-02	PREMIER INN	NOTTINGHAM	87 bed	24/06/2013
TV-06-A-04	THISTLE TEES VALLEY	MIDDLESBROUGH	132 bed	03/10/2013

However, the locations of the hotels selected are not particularly comparable to the Old Kent Road and include hotels much smaller than the 195 rooms proposed (including one of only 9 rooms). In addition, a number of the surveys were undertaken away from the peak season when occupancy (and therefore activity) would be lower.

There have been other hotel applications and indeed developments in Southwark which could have been used for comparison. The most recent one is the application for 160 Blackfriars Road, your reference 18/AP/1215. This is a similar sized hotel to the one proposed at Southernwood although in central London close to both London Underground and National Rail stations, to many visitor attractions and offices. The applicants faced similar issues with TRICS and used older data from TRAVL on the basis that factors on the ground for the hotels had not changed that much and so were therefore still relevant.

The table below compares the forecast trip volumes for the two similar hotels.

Source	TA Table 9.8	18/AP/2815	Variation
Total AM Peak Arrivals	27	49	181%
Total AM Peak Departures	52	86	165%
Total PM Peak Arrivals	50	86	172%
Total PM Peak Departures	32	57	178%
Weekday Arrivals	531	897	169%
Weekday Departures	536	856	160%

We note that there seems to be a high number of arrivals in the AM peak and departures in the PM peak which is likely to be the outcome of central London locations of the Blackfriars Road proposed hotel and the TRAVL survey sites used.

However, the comparison indicates a substantial underestimation of trip volumes in all time periods. The Southwark committee report of 9th October 2018 for 18/AP/2815 concluded that the presented volumes were broadly comparable to their own analysis albeit it indicated slightly higher volumes. This raises obvious issues about the robustness of the much lower Southernwood forecasts.

Using Blackfriars Road as a base an adjustment of mode share is required as the Southernwood site is not close to London Underground, or National Rail stations (nor indeed London Overground and DLR)

Comparison of Blackfriars Road and Southernwood mode shares

Mode	18/AP/2815	Table 9.8	Extra trips	Reduced trips
Bus	12.00%	29.20%	17.20%	
Underground	31.00%	0.00%		-31.00%
Car Driver	1.00%	0.00%		-1.00%
On Foot	12.00%	42.50%	30.50%	
Train	31.00%	0.00%		-31.00%
Cycle	1.00%	0.40%		-0.60%
Car Passenger	1.00%	0.00%		-1.00%
Taxi	11.00%	28.00%	17.00%	
Motorbike	0.00%	0.00%		
Other	0.00%	0.00%		
	100.00%	100.10%	64.70%	-64.60%

The applicant's rationale for allocating half of the rail modes share to walking and splitting the remainder equally between bus and taxi has not been set out in the TA and in TfL's assessment cannot be accepted as robust.

Based on the higher trip rates of the Blackfriars Road hotel and an alternative set of mode share assumptions following rail trip reallocation the following table presents a potentially more credible set of forecasts which reflects that it is likely that the walking mode share will be below that for Blackfriars Road and not almost four times higher. The higher taxi share is based on the undesirability of trying to board crowded pre-BLE peak hour bus services, especially with luggage or as a group, the comparatively slow journey times for buses and the greater difficulty of planning and taking a trip by bus especially where changes are required. These are compared to the TA forecasts and the differences calculated.

Mode	Table 9.8	AM		TfL revised mode share	AM Revised *		AM Difference	
		Arr	Dep		Arr	Dep	Arr	Dep
Bus	29.20%	8	15	29.20%	14	25	6	10
Underground	0.00%	0	0	0.00%	0	0	0	0
Car Driver	0.00%	0	0	0.00%	0	0	0	0

On Foot	42.50%	11	22	6.00%	3	5	-8	-17
Train	0.00%	0	0	0.00%	0	0	0	0
Cycle	0.40%	0	0	1.00%	0	1	0	1
Car Passenger	0.00%	0	0	0.00%	0	0	0	0
Taxi	28.00%	8	15	63.80%	31	55	23	40
Motorbike	0.00%	0	0	0.00%	0	0	0	0
Other	0.00%	0	0	0.00%	0	0	0	0
		27	52	100.00%	49	86	22	34

* Revised trip numbers using higher trip rates from Blackfriars road and revised mode share

The above illustrates the potential for significantly underestimating taxi related traffic at the proposed hotel which is a function of its current bus based public transport accessibility. This has obvious implications for the taxi arrangements detailed under Policy T6. A more sustainable mode share would be achieved if it was delivered post BLE in phase 2 as per the original AAP phasing plan.

An alternative scenario is that if a budget hotel is located at the site more people would travel by bus and not taxi. This could produce the following outcome:

Mode	Table 9.8	AM		TfL revised mode share	AM revised *		AM difference	
		Arr	Dep		Arr	Dep	Arr	Dep
Bus	29.20%	8	15	65.00%	32	56	24	41
Underground	0.00%	0	0	0.00%	0	0	0	0
Car Driver	0.00%	0	0	0.00%	0	0	0	0
On Foot	42.50%	11	22	6.00%	3	5	-8	-17
Train	0.00%	0	0	0.00%	0	0	0	0
Cycle	0.40%	0	0	1.00%	0	1	0	1
Car Passenger	0.00%	0	0	0.00%	0	0	0	0
Taxi	28.00%	8	15	28.00%	14	24	6	9
Motorbike	0.00%	0	0	0.00%	0	0	0	0
Other	0.00%	0	0	0.00%	0	0	0	0
		27	52	100.00%	49	86	22	34

* Revised trip numbers using higher trip rates from Blackfriars road and revised mode share

In reality it is likely that mode share between taxis and buses pre BLE would fall somewhere between these two scenarios. However what is demonstrated is the need to plan for both a high taxi share and a high bus share - the former of up to 90 taxi trips in the morning peak and the latter almost a bus load of people departing from the hotel at this time.

Summary and remedy

Due to the multiple issues with the Transport Assessment it is not currently considered fit for assessment purposes and therefore contrary to Policy T4. As well as the methodological issues there are errors in the text and many

references to documentation or data that is not present or has not been made available.

Further work will therefore be required to demonstrate that all elements of the development trip generation and mode split are robust and that the public transport network, active travel provision and that for taxis will be able to cope with the demands. Work on the hotel is particularly important given its on phase 2 post BLE commitment land and thus where additional high peak time trip generating uses would not be accepted ahead of this.

Cycling (DLP Policy T5)	Non-compliant	Design changes required
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Cycle parking for the housing is significantly below the minimum standards required by the draft London Plan (38% less) and the adopted London Plan (33% less), despite the area already having a high cycle mode share and London Plan and local policies supporting active travel. The justification given for this low provision is that the arrangements have been agreed with Southwark Council, although no further details have been provided as to why the Council would seek cycle parking levels significantly below its own minimum and London Plan standards. All cycle parking should also be designed to meet London Cycle Design standards and be managed through a suitable plan.

As per our pre-application meeting we indicated that we would be seeking a contribution in the order of £250k for the expansion of the TfL Cycle Hire Network from Bricklayers Arms and which could connect with the planned extension along Jamaica Road to Canada Water. A suitable site within the public realm or on street would also need to be identified. TfL's experience is that cycle hire is particularly attractive for hotel guests who generally don't have their own bike as well as supporting town centre uses and residential development. The site is also on Quietway 1 and thus there would be another option for cyclists to use of the planned improved facilities on OKR and the option to link into other parts of the existing and planned cycle network in the OKR area.

Summary and remedy

The proposed cycle parking arrangements do not comply at least with the minimum levels required by Policy T5 of the draft London Plan, and changes are also required to ensure London Cycling Design Standards (LCDS) are met, there are also issues with the placement away from the main residential cores.

Remedy: Before determination the design should be amended to reflect policy and guidance, as subsequently it will be too late, clarity should be provided as to where the public realm cycle parking would be located.

Car Parking (DLP Polices T6.1-T6.5)	Non-compliant	Design changes required
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The car free scheme is in principle welcomed subject to sufficient mitigation of the demand for travel it will generate on other modes. This should be through improvements to active travel and to bus services on which residents, visitors, and hotel guests and staff will particularly rely on unless or until the BLE opens.

Residents except Blue Badge holders should be exempt from being able to apply for a controlled parking zone (CPZ) permit and this should be secured in the S106 agreement. Consideration should also be given to the hours of operation and extent of the existing CPZ to ensure it would operate effectively in discouraging residents' car parking and that associated with the retail, cinema and hotel uses and if necessary, a S106 contribution secured for additional controls.

As per our pre-application advice the residential Blue Badge parking should initially be set at 3% of the number of flats with provision made for up to 10% should the need arise. As the proposals are for the full 10% from the outset, consideration could be given to a lower level of provision at the outset especially for phase 2 once BLE has been confirmed and the PTAL would increase from 4 to the maximum 6b) and as the town centre is built out. Experience of the demand from occupiers of phase 1 may also inform provision for the later phase. Thus we would suggest that having shown that the 10% of Blue Badge spaces could physically be provided, phase 2 Blue Badge provision is not confirmed at this stage but instead closer to the time of implementation by which time demand will be clearer and the BLE will have been committed

Despite previous advice, a Car Parking Design and Management Plan has not been provided as part of the application, contrary to draft London Plan Policy T6G. The applicant should therefore indicate how the proposed Blue Badge parking will be allocated, managed and enforced - which should be on the basis of need and not tied to particular flats or sold on.

The proposed Blue Badge space for the hotel at phase 1 is remote from its front entrance and disabled people will have to negotiate servicing activity as well as cars in the existing retail car park and then enter via a back door or use what will be a narrow footway for the activity generated on the OKR. This is not an acceptable inclusive approach. Furthermore, no Blue Badge parking is proposed for disabled hotel guests during phase 2 construction which is expected to take 3 years.

As also previously advised the proposed use of the TLRN for hotel pick-up and set down is not acceptable for highway safety and operational reasons and in any case would be illegal other than if by taxis in some circumstances. There is not currently a problem because there is no demand for such activity at this location, however a car free development without any off street provision for drop offs and pick ups and especially the hotel element will create such demand. No provision is being made in the application proposals to satisfy this demand for drop off and pick up.

Notwithstanding the above, it is unacceptable in principle to create a problem that then needs to be mitigated contrary to Vision Zero of reducing road danger through better (not worse) design. This problem should be designed and/or managed out, especially given the significant underestimation of demand described in T4 above.

The alternative use of Rowcross Street has been mentioned although this is considered unlikely given it is inconvenient to access and distance from the entrance to

the hotel. In any event the application proposals call for the use of Rowcross Street for servicing of the hotel during construction of phase 2 as well as construction and servicing traffic from the phase 1. This road itself is not suitable for use by coaches and other large vehicles.

The electric vehicle charging points are proposed to comply with the draft London Plan and should be secured by condition along with the disabled parking and car club spaces and the Car Parking Design and Management Plan.

Summary and remedy

The proposals for the hotel present a number of issues that make them non-compliant with Policies T6.1-T6.5 and no Car Parking Management Plan has been provided.

Design changes are required to the Hotels access arrangements to

- **Enable the safe and efficient operation of pick up and set down by taxis and other vehicles.**
- **Enable continuous provision of Blue Badge parking for the Hotel**
- **Accommodate or manage the needs of coaches given the lack of facilities in the surrounding area and on site.**

To accommodate the above it is recommended that the hotel is provided on another part of the site where its access requirements can be fully included from the outset. We consider unlikely that the significant design changes and stringent management measures necessary to make the existing proposals workable can be made to address the issues set out above and those elsewhere in these comments.

When considering future access arrangements for the Old Kent Road and Humphrey frontages the Vision Zero and Healthy Streets approaches should form part of the design process at an early stage, with no use for vehicular access activities other than to continue to serve the existing retail warehousing.

A Car Parking Design and Management Plan should be provided and agreed.

Deliveries, servicing and construction (DLP Policy T7)	Non-compliant	Design changes required
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Servicing Trip Generation

A robust assessment of the nature and extent of all service trips is required to establish the requirements of the development in order to enable the design of servicing facilities and subsequent demonstration of their adequacy.

The source of the information presented in the Appendix of the revised Delivery Service Plan (DSP) is not clear as there are references elsewhere in the text to other

developments approved by Southwark as well as the references at the bottom of each table.

Nor is it clear why there is a column for service vehicle arrivals at a station as none is proposed, or why the Service % Vehicles arrivals are not consistent with the actual numbers in the adjacent volume part of the table.

It is noted that a range of values is presented for the hotel, if and when using a range of values, the most onerous or worst case should be assumed, not the best case with the fewest vehicles as has been applied in the TA.

As with the main trip generation, information should be specific to a comparable development, references to studies and other pieces of work dating back to 1989 are not understood, credible or acceptable.

There is inadequate information about the type of hotel and its offerings (e.g. rooftop bar / events etc.) to know whether the lowest end of the quoted range is more appropriate than the upper end of the quoted range.

To support the application for the Blackfriars Road Hotel (18/AP/2815) their consultants undertook a survey of an adjacent hotel, a similar exercise should be undertaken here to include dwell time and vehicle type. The long distances between the delivery vehicle and goods in will extend the dwell times here, this should be incorporated into the Delivery Servicing Plan to demonstrate adequacy and operability.

Hotel servicing access

Upon completion of the hotel it is proposed to utilise part of the retained retail car park for its servicing (and Blue Badge parking) on a temporary basis, this is not considered a particularly ideal or efficient solution and one that will persist for many years before phase 2 commences - the application material suggests 8.

During the 3 years of phase 2 construction it is proposed to displace service vehicle loading and unloading to Rowcross Street and walk deliveries/waste along the OKR frontage and the previously mentioned pedestrian pinch point on the corner of Humphrey Street and Old Kent Road which has a width of 2.8m at this point. This is in addition to navigating the pedestrian flows, table and chairs outside the hotel frontage and proposed taxi pick up and set down on the TLRN (which in itself is not acceptable as indicated elsewhere)

TfL questioned the phase 2 arrangements in February 2019 and requested a revised Delivery Servicing Plan detailing the proposed phase 2 arrangements. We note that in spite of repeated requests to Southwark we have only been provided with a copy of this document (dated Feb. 2019 and containing only minor changes) on 23rd April 2019. We also note a similar delay in putting these proposals on your website for viewing by nearby residents and stakeholders.

The operability and success of the servicing strategy in phase 1 depends on accuracy of trip generation (which is questionable), retail car park forecasts and the implementation of an as yet unseen Car Parking Management Plan.

Summary and remedy

TfL considers these proposals to be poorly designed and supported with insufficient information to demonstrate their workability. As such we consider the proposals and their supporting Delivery and Servicing Plan unacceptable and contrary to draft London Plan Policy T7.

The basic problems stem from the sub-division of the phase 2 plot which creates a small and constrained plot and the access needs of the hotel development proposed to occupy it.

Whenever it (or anything else) is delivered in its proposed location there will be issues of vehicular activity conflicting with increased pedestrian flows and the emerging Healthy Streets scheme which is necessary to deliver pre-BLE transport improvements.

Accordingly we would suggest reconfiguring the Masterplan and placing the hotel in a different part of the site where adequate access for taxi and coach traffic and continuous on-site servicing could be designed in. This would remove many of the above problems and allow the Hotel to function properly making it a more attractive offering.

We would reiterate our pre-application advice and policy requirements that a robust and evidenced DSP should support the application.

Construction Logistics Plan

Our pre-application advice stated that a draft Construction / Logistics Management Plan should be provided to support the planning application, to be developed in line with TfL's guidance. This has not been actioned and only a few technical diagrams with no explanation or commentary have been supplied.

A basic summary of construction traffic volumes and their routing should be provided to give an understanding of what needs to be managed during the 10 years of construction. The proposed vehicle routing should also be revisited since Rowcross Street is signed as unsuitable for HGV traffic, and a left turn in from the Old Kent Road is not possible without blocking the TLRN in the process.

CLP Summary and remedy

We would reiterate our previous advice that to comply with draft London Plan Policy T7 an outline CLP should be prepared, which should cover how Rowcross Street in-particular will be affected during the 10 years of construction.

Agent of change

Noise mitigation and associated mechanical ventilation will be required to protect residents and guests occupying flats/rooms frontages on or close to the TLRN, bus operations and passengers and residents from noise, vibration and other adverse impacts, including from 24/7 bus operations. In addition, noise and vibration impacts from BLE operations and during construction of the station in particular must also be addressed.

Funding transport infrastructure through planning (DLP Policy T9)	Tbc	s106, s278 tbc
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In line with draft London Plan Policy T9 to mitigate the transport impacts of the development, necessary and proportionate obligations are required towards sustainable travel including:

- Delivery of the Healthy Streets scheme which TfL is developing for the TLRN which will improve bus priority and promote walking and cycling. This will be expected to be secured in the s106; for delivery through a s278 agreement with TfL.
- Improvements may also be required to borough highway including cycle routes linking across the Old Kent Road and walking connections to local facilities and services. We assume that LBS officers will assess these requirements and negotiate appropriate mitigation in the context of draft London Plan and Southwark policy including mode shift targets, Healthy Streets and Vision Zero.;
- Bus service enhancements as buses are already overcrowded, particularly at peak times. Based upon assessment work undertaken by TfL and what has been secured for other developments in the area, a [tariff] of £2700 per residential and hotel unit is expected and justified, to be included in the s106. A further s106 contribution may potentially be justified for the other non-residential uses to be confirmed once the applicant has undertaken further work on trip generation and assessment;
- Cycle networks, infrastructure and incentives;
- Free car club membership and appropriate management of the spaces; and
- Mayoral CIL payable at a rate of £60 per sqm.

Furthermore, given the nature and extent of the strategic transport obligations TfL should be a signatory to any S106 in order to be able to directly enforce these obligations and those relating to BLE safeguarding.

A copy of our full BLE response is provided below

Crane Anne

Mon 29/04/2019 09:18

To:

Buttrick, Tom <Tom.Buttrick@southwark.gov.uk>;

Cc:

Colin Wilson <Colin.Wilson@southwark.gov.uk>;

Howson, Pip <pip.howson@southwark.gov.uk>;

Havelock Beth;

Welch Mark;

Welch Michael;

Dear Tom,

As you know there have been discussions with the Southernwood regarding the relationship between the application proposals, your case reference 18/AP/3551, and the BLE and also this matter was raised in the stage 1 consideration by the Mayor. I set out below in more detail our current concerns and comments, which should be seen as part of TfL's formal response to the application along with our forthcoming detailed comments on surface matters and what has already been stated, including in the stage 1 report.

Bakerloo Line Extension Running Tunnel Safeguarding

To date discussions with the applicant in respect of BLE interfaces have been in regards to the hotel which is part of phase 1 of the Southernwood planning application. However, the application also includes a second phase of the development comprising residential, retail and a cinema in the middle part of the site between the proposed hotel on Old Kent Road and phase 1 residential and retail on the northern land adjacent to Rolls Road. Whilst outline permission only is sought for this phase 2 development, only internal layouts and external appearance have been reserved for subsequent approval.

The phase 2 development would include a basement for a cinema and for car parking and servicing. Therefore, the running tunnels exclusion zone cross-section provided by TfL to the applicant applies to this phase as well as to the hotel. Given this, to satisfy TfL that adequate and appropriate safeguarding would be made as part of the phase 2 development for the running tunnels, it is necessary for the applicant to demonstrate that all subterranean structures will comply with the limits established in the exclusion zone cross section already provided to the applicant. From the information available on the second phase, the proposals do not achieve this safeguarding and indeed there is an explicit intention stated in section 8 of Version 2 of the Walsh Structural Report (dated 27.03.19) as follows:

¶ If the exclusion zone is also imposed on phase 2 it will affect the proposed cinema. As our design intent is to span our foundations across the exclusion zone, the building would impose minimal load on to the top of the tunnels. We believe that it would be possible to demonstrate that tunnelling below Phase 1 could be

accommodated by the structure and that construction of Phase 2 will have an acceptable impact on the BLE tunnels.

We would therefore during detailed design look to justify and agree a smaller vertical exclusion zone. If such an approach is not acceptable to TfL we will amend the ground floor level over part of the basement to accommodate the cinema below. This would not affect publicly available space as access to the area could be accommodated with ramping of the public area and the public realm itself.

The cinema is part of the hybrid application and it will as currently proposed entail encroachment into the tunnel exclusion zone. TfL cannot accept these proposals as they stand as they provide inadequate safeguarding to the BLE. Furthermore the alternative arrangement put forward in the Walsh report to increase the distance between the development and the running tunnels would raise the ground level of the development. It would be for others to judge the acceptability of the impact of the consequently required ramping on the use and enjoyment of the public space and of the change in levels in the buildings themselves. However, approval is not being sought for this alternative proposal and thus the application must be determined as submitted including the proposed levels and encroachment into the tunnel exclusion zone.

Were a permission to be granted for the outline element of the development to safeguard the delivery of BLE conditions are required to ensure that the applicant is obliged to ensure designs enable the phase 2 structure to avoid the exclusion zone, notwithstanding the details for which permission has actually been sought This would require further design work to ensure that basement spans over the tunnels and to demonstrate that the tunnels are not excessively loaded / unloaded given the life of the development will be shorter than the tunnels built for the BLE. Given this is of fundamental importance to the acceptability of the phase 2 development our view is that this work must be carried out prior to determination of the permission lest a condition is imposed with which compliance is impossible or very costly and complex or requires other changes to the approved design e.g. levels.

The design of both the phase 1 and 2 parts of the development will also need to ensure that the proposed buildings and structures will not be impacted by any settlement / heave caused by TBM or SCL tunnelling. Furthermore the entire development but especially the cinema as it will be in such close proximity to the tunnels and is a sensitive use will require adequate noise and vibration mitigation against the forecast effects from operations of the BLE.

So far as we can tell, the current proposals would appear to place no permanent structures in the exclusion zone, but there is an indication in section 10 of the aforementioned Walsh report suggesting sheet piles will be placed in this zone temporarily with the intention of removing them subsequently. The report does not describe how deep these piles would be. Sheet piles can be difficult to extract after concreting, if they not removed then it will be very difficult to tunnel through them. Sheet piling will disturb the ground before the TBM passes through which could create an escape route for pressurised slurry if used. Further work is required to guarantee there will be no obstructions or ground disturbance that could jeopardise the tunnelling before TfL can accept such an approach.

The possibility of raising the BLE alignment was previously discussed with the applicant. Following design development TfL are proposing to raise the alignment by 2m in this location (see attached mark up). This is likely to have an impact on the proposed basement due to its close proximity to the exclusion zone. Further work is required to understand how the development, and in particular the hotel and the basement cinema and parking and servicing area, will accommodate a revised vertical alignment.

In addition, the Southernwood drawings appear to show no lift pits currently. These are usually required and thus it should be noted we would object if they were to be proposed in the future and encroach into the exclusion zone. We would strongly suggest the applicant reviews their drawings in respect of lift requirements and other details before a decision on the current application to confirm that the development once designed up to full detail can be implemented as currently proposed without encroachment into the exclusion zone and is also capable of addressing the other issues raised above.

However, we recognise that the applicant cannot complete a full design prior to determination of the application. Therefore to ensure that there are no temporary or permanent structures in the exclusion zone be it in the phase 1 or 2 development and to address the other concerns set out above, we consider that in this case there should be a s106 obligation placing a legal requirement on the applicant for appropriate safeguarding to be agreed with TfL. We consider a s106 obligation is justified in this location because due to the proximity of the site to the proposed station the horizontal alignment is more or less fixed. Furthermore we request that TfL are a party to the agreement to enable it to be fully involved in the consideration of the technical details and can enforce if necessary itself. The obligation provisions could be based upon the wording of the condition agreed with the applicant for the Cantium development and on which Walsh are also advising. We would be pleased to propose precise wording as part of the s106 discussions. However, in this case given the proximity of the development both horizontally and vertically to the BLE early works which could take place prior to fulfilment of the obligation should be defined as demolition and site clearance only in respect of the phase 2 site and that part of the Phase 1 on which the hotel would be developed. TfL would have no concerns if the early works for the rest of phase 1 included additional elements such as the laying and / or diversion of infrastructure and services; access works on or adjacent to the public highway (subject to any necessary agreements pursuant to s184 or s278 or equivalent).

Lastly, we cannot find the Walsh Structural Report (dated 27.03.19) on the Council's website of documents to be considered as part of decision making on this application. Thus we have no confirmation that the proposals put forward in this report will be required to be followed through to implementation and thus we cannot even be assured that if permission is granted that the hotel foundations will be built outside the exclusion zone. In this circumstance a suitable s106 obligation to TfL is in our view even more essential.

Bakerloo Line Extension Station □ Old Kent Road 1

We have discussed with the applicant the proposal for a Bakerloo line station on the site of the Tesco superstore, as consulted by TfL in 2017. At the current time, this station location remains TfL's preferred option. However, it was noted by TfL to the applicant that there are alternative proposals including within the Tesco site and potentially including the Southernwood retail park site, as proposed by Invesco and Tesco. TfL are obliged to demonstrate consideration of these latter proposals.

We have also discussed with the applicant the potential need for TfL to temporarily close Humphrey Street for the duration of works on the station and this section of the line. This will be for a period which could be 5 or more years and thus it would be necessary to ensure that the development can at both phases and also during construction of phase 2 operate safely and effectively in terms of access. Our concern relates particularly to vehicles serving the hotel and during the construction of phase 2 and its subsequent occupation all of which could take place prior to completion of the BLE works. In addition, TfL cannot rule out the need for further land to support construction and operation of the station. We will consider this further as part of our ongoing work towards our objective to develop a scheme which could secure Transport and Works Act 1992 order consent. This will therefore require us to take no more land but also no less than is required to ensure that our infrastructure can be built and operated safely and efficiently.

TfL notes that the applicant's proposals place constraints on where the running tunnels can be constructed through foundation and other structure-free areas of the development. Owing to the proximity of the applicant's site to the proposed Bakerloo line extension station location, the applicant's proposal will reduce optioneering for the station siting and its design as the tunnels' location will be dictated by the consented safeguarded foundation-free corridors of the applicant's scheme (assuming planning permission is granted and related details approved). Whilst we consider it should still be possible to build the OKR 1 station, it does reduce our capability to develop the scheme so as to achieve greater alignment and conformity with Southwark Council's draft planning policies and site allocations set out in the draft New Southwark Plan and Old Kent Road Area Action Plan and to deliver on the Mayor's objectives and policies in the Mayor's Transport Strategy and the adopted and draft London Plan. Furthermore it is likely to add to the risk and complexities that may impact on cost of construction of the BLE for these reasons and because of the need to take account of what is expected to be a completed hotel building and phase 1 housing and retail together with potentially some or all of phase 2. Similar impacts would arise on phase occupants due to implementation of the applicant's own phase 2 scheme.

Summary

In summary we would strongly urge the Council if they are minded to grant permission to allow only the rear portion of the site to proceed ahead of the BLE being completed. Even the alternative of delaying the hotel and phase 2 commensurate with the designation of the land in the emerging but as yet not consulted upon policy, to when BLE is committed or started on site could introduce risks and complexities. These may impact on the delivery of the BLE since these buildings are very likely to be completed and occupied ahead of BLE with the attendant impacts during construction and on the design flexibility of the BLE.