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Your Ref: 17/AP/4797

Transport for London
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Dear Victoria,

Re: Redevelopment of Burgess Business Park, Parkhouse Street, London, SE5 7TJ – TfL Initial Comments

Thank you for consulting TfL on this referable planning application. TfL notes from the documents submitted that the proposal is:

Demolition of the existing buildings and redevelopment of the site to provide 505 residential units, up to 3375 sqm (GIA) of Class B1 commercial floorspace, up to 117 sqm (GIA) of Class D2 leisure floorspace and up to 570 sqm (GIA) of Class A1-A3 floorspace (retail / financial and professional services / cafe / restaurant)

Please note the following comments represent the views of TfL officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the GLA.

Location & Context

The development site is located to the north and south sides of Parkhouse Street. The southern section of the site is bounded to the east by Wells Way, to the north by Parkhouse Street, and to the south by further warehousing. This part of the site is currently accessed from the southern side of Parkhouse Street.

The northern section of the site is bounded by parkland to the north-west, commercial development to the north-east, Parkhouse Street and residential properties to the east, and residential properties fronting Southampton Way to the south. The northern section of the site is accessed from the northern side of Parkhouse Street.

None of the roads surrounding the site form part of Transport for London Road Network (TLRN) or the Strategic Road Network (SRN). The nearest section of TLRN is A202 Peckham Road approximately 700m to the south of the site. The nearest section of SRN is Camberwell Road approximately 470m to the west of the site.

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The nearest national rail station is Denmark Hill approximately 1.4km away, the nearest underground stations are Kennington and Oval, which are both 2km away, and Elephant and Castle, which is 2.3km away. The nearest bus stops are located on Wells Way (stops G and F), which are approximately 130m from the edge of the development site on Parkhouse Street.

Due to the limited transport options in close vicinity of the site, the majority of the site has a current PTAL rating of 2, and the western section of the site has a PTAL rating of 4, on a scale of 1 to 6 where 1 represents poor and 6 represents excellent.

The nearest Quietway is route 7, which runs approximately 250m to the north and east of the site, through Burgess Park, between Portland Street and Edmund Street. When complete, Route 7 will provide a link between Elephant and Castle in the north and Crystal Palace in the south.

The nearest Cycle Superhighways are route CS5 and CS7, which are both located approximately 2km to the west of the site. Route CS5 provides a link between Oval and Pimlico, and route CS7 links to Quietway 7 at Elephant and Castle.

Car Parking

TfL welcomes the proposal for the development to be car free for general vehicle parking and that future residents will be exempt from applying for residential on-street parking permits, which should be secured via a planning condition or obligation. The site is located in Southwark Controlled Parking Zone (CPZ) EC, which operates Monday to Friday 8.30am to 6.30pm.

The proposed development includes 18 disabled parking spaces, which is sufficient for draft London Plan (2017) standards, which requires at least 3 per cent disabled blue badge parking at the outset of the development. The applicant should demonstrate on a plan that future disabled parking provision can be accommodated for up to 10% of the total number of residential units (i.e an extra 50 spaces, 7% additional units), if there is future demand for additional blue badge parking. This could be on site or possibly through agreement with LBS nearby on street.

Para 4.4.3 of the TA states that blue badge parking spaces will be allocated to specific units. TfL requires that any on-site disabled blue badge parking should not be leased with a particular unit and instead managed to ensure that any Blue Badge holder can use but no one else. Given the relative isolation of the site, good provision for disabled people who are Blue Badge holders is particularly important.

The residential travel plan should include details how on-site disabled car parking will be managed. Disabled spaces should not be leased to residents who have disabled blue badge parking permits but instead arrangements should be on a more flexible basis which could comprise allocation to specific BB holders but no (long term) leasing. In any case when these residents move out of the development, or no longer have a blue badge permit, then the parking space should revert back to the development's management.

The development's management should monitor the use of on-site disabled blue badge parking and if necessary increase disabled blue badge parking provision, in line with demand. There should also be management arrangements in place to ensure there is no parking by non Blue Badge holders.

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The car parking and any on site drop off/pick up facilities should be the subject of a management plan to be secured by condition.

Local Buses

Because the development site is located beyond reasonable walking distance from local train stations, the majority of public transport users are likely to be reliant on local buses for their entire journey or at least to station.

Bus demand in this location is likely to increase following implementation of this development and other nearby committed development. However it is not clear at this stage whether this will cause capacity issues especially since bus services in the wider area are likely to be re-planned to accommodate growth, notably that on the Old Kent Road but also at the Aylesbury Estate and at E&C where s106 mitigation has already been secured.

TfL therefore consider that a contribution of £90,000 to be included in the s106 agreement is justified as mitigation, which TfL can draw upon should there be a bus overcrowding issue over a 2 year period from first occupation or upon occupation of 300 homes, whichever is sooner.

Cycling

Furthermore due to limited public transport options in the vicinity of the site, cycling will be an even more important mode to encourage sustainable travel. During pre-planning discussions TfL requested that land and/or a financial contribution via s106 should be secured for a medium sized cycle hire docking station, to promote active travel in an area where there are no docking stations currently. This is in line with the Mayor's Transport Strategy policies 5, 6, 7 and 8 which set out support for active and green modes of transport, and with the Mayor's objective to increase the proportion of people walking, cycling and taking public transport to 80 per cent of journeys by 2041.

An indicative location for the medium sized cycle hire docking station is on the southern side of Southampton Way (B217), to the north of the of junction with Parkhouse Street (indicative location highlighted as red on the plan below)



Having further assessed the proposals now set out in the application TfL continues to be of the opinion that a medium size (30 docking points) cycle hire docking station is justified to meet demand arising from this development. Therefore we would request that £200,000 is secured in the s106 agreement. We also wish to discuss with LBS and the applicant a suitable site either on highway or within the development.

Section 4.5 of the TA states that long and short stay cycle parking will be provided in accordance with London Plan (2016) minimum standards. However, the applicant should provide a detailed breakdown of proposed long and short stay cycle parking to demonstrate that this can be achieved. Furthermore cycle parking should now meet at least the draft London Plan (2017) minimum standards.

Para 4.5.3 of the TA states residential long stay cycle parking will be located on the ground floor and in the form of two tier racks, with 5% of all long-stay spaces as Sheffield stands. TfL welcomes the proposal for long stay residential cycle parking to be provided on ground floor level. The two-tiered cycle stands should be provided in line with LCDS; specifically, a minimum aisle width of 2500mm beyond the lowered frame is required to allow cycles to be turned and loaded. An overall aisle width of 3500mm should ideally be provided where there are racks on either side of aisles. The minimum height requirement is 2600mm.

For non-residential uses it is unclear from the application documents of the form of proposed long stay cycle parking provision (i.e. two tier stands or Sheffield stands). It is recommended that some spaces are made available for larger type of cycles, e.g. cargo cycles and cycles adapted for use as mobility aids. Cycle parking for larger spaces should be provided in accordance London Cycling Design Standards, which advise 1.5m spacing between cycle stands.

Public Realm

The proposed development includes a number of new routes through the site, albeit these will be for pedestrians and cyclists and service vehicles and d blue badge vehicles only. This 'car free' design is welcome but we would suggest that in designing the layout of the development that no vehicle can take a through route and in particular general traffic taking



short cuts is designed out. . However, these routes should be accessible to the public 24 hours a day, 7 days per week if on foot or cycle. These requirements should be secured by condition and/or s106 if planning permission is granted.

Given the proposed development changes the street layout to provide routes through the site, it is recommended that consideration is given to providing new or updating wayfinding signage (preferably Legible London) at key decision points surrounding the site, including at Burgess Park. The CLoS assessment carried out also identified signage as a potential point for improvement on the routes that were assessed.

A PERS audit has been undertaken by the applicant. This audit identified areas for improvement on Parkhouse Street, including surface quality, maintenance of the footway, and footway widths along the southern footway. On Cottage Green, located directly to the south of the site, the following issues were identified; low effective width, lack of tactile information, poor maintenance, and poor surface quality. Photos of Parkhouse Street and further showed that road markings along Parkhouse Street are faded.

TfL request a contribution of £15,000 from the applicant payable to Southwark to be included in the s106 agreement in order to provide new signage along the site's boundary and update existing signage at key decision points in the site's surrounding area,

Below are comments in relation to the proposed public realm design for your consideration:

1. The strategy for servicing generally looks acceptable as it locates servicing activity to back-of-house 'yards'. Given that there won't be too much vehicle movement in and out of those yards, the applicant should consider the detail of the junctions onto Parkhouse Road and Wells Way. At the moment they're shown as conventional junctions, with tactile paving (albeit with raised entry treatments) rather than as minor accesses, and these will probably still be read as priority for vehicles turning in and out. The design should be amended to do more to enhance pedestrian priority at these locations, e.g. by continuing the footway material across and/or having tighter corner radii.

2. The paving strategy (page 126 of the DAS showing footways on surrounding roads will have different treatment compared to 'streets' within the development. There is a risk that this may create the impression of an inward-facing development. Even though the internal streets will be privately managed it would be preferable if there was a more seamless approach with Parkhouse Street, in particular, treated as part of the site and dealt with in the same way as the internal streets.

3. TfL welcomes the proposal for active frontages on Wells Way provided there is demand to support these uses, however there is proposed to be a long stretch of blank wall along what is assumed to be the highway boundary. This will reduce the width of the useable footway compared to the existing situation. It will also mean that existing street furniture and trees will probably need moving as otherwise they will narrow the space further and reducing the usable width to an unacceptable level. Whilst this is a decision for Southwark as the highway as well as planning authority we would suggest that this part of the scheme is redesigned to retain the trees and existing street furniture whilst also maintaining comfortable and safe footway widths.

There is a particular issue in respect of the existing bus stop at the southern limit of the development site on Wells Way. The masterplan drawing doesn't show a bus shelter here (even though there is currently one there) but does show residential entrance and a bin store instead. At the least the bin store should be relocated away from the bus stop location, as



waste collection could impact the operation of the bus stop but preferably the residential entrances should be moved for the benefit of both the residents and bus passengers.

The masterplan drawing should be amended to include the existing bus shelter and ensure sufficient footway width is provided.

4. The proposed six-storey building at the junction with Parkhouse Street brings the building line much closer to the carriageway compared to the existing situation, which could lead to a narrow and cluttered footway. The footway should have a minimum of 2.0m clearance when taking into account street furniture or trees, in line with TfL's Streetscape Guidance. This is especially important as a limited footway width was identified as an issue in the PERS audit at Parkhouse Street.

5. The proposed development will increase pedestrian and cycle movement at the existing Wells Way / Parkhouse Street junction. The existing junction kerb radii are large, which leads to extra long crossing distances.

TfL recommends that the borough seeks improvements to this location, such as reducing the width of the junction mouth, reducing the crossing distance, and raising the carriageway at this point. Consideration might also be given to a better crossing facility than the existing reserve on Wells Way, for example a zebra crossing, to be funded by the developer.

It is recommended consideration is given to improvements at Parkhouse Street and Cottage Green, as these roads bound the site. The development will likely increase footfall on these footways and improving the pedestrian environment on these links as part of the development would encourage walking to and from the site, which is in line with the Mayor's Transport Strategy policies 5 and 7. This should be secured in the s106 agreement and/or by condition as appropriate.

Delivery and Servicing Management Plan

The application documents include an Outline Delivery and Servicing Management Plan. The document states that the development's concierge service will accept deliveries for residential units. This is welcomed as it has the potential to reduce the number of delivery trips by reducing the number of failed deliveries and potentially through consolidation. The proposed concierge should accept deliveries for both private and affordable units.

For the proposed commercial units the document should include measures to ensure servicing trips for commercial units can be rationalised where possible, for example:

- single contract for refuse collection for the whole development,
- shared deliveries for all commercial units,
- use of consolidation centres,
- encouraging development wide bike freight,

The document should also include measures to encourage cycling freight trips, such as ensuring sufficient provision has been made for cargo bikes.

A Detailed DSP, which includes the measures set out above, should be submitted prior to occupation. This should be secured in the s106 agreement and/or by condition as appropriate.

Outline Construction Logistics Plan (CLP)



Below are TfL's comments in relation to the Outline CLP:

- The document includes a high level construction programme, however the applicant should confirm the peak period of construction activity. A detailed construction programme and methodology should be provided in the detailed CLP document
- Section 3 includes details of potential construction vehicle routing and site access. However, the document should include potential context considerations, challenges and community considerations.
- In the measures table (Section 5), a construction staff Travel Plan is shown as a measure to be considered rather than a proposed measure. The Outline CLP should be amended to include details of the development's construction staff Travel Plan, and show it as a proposed measure.
- Section 6 of the Outline CLP includes high level details of peak period and daily construction trip generation. The applicant should provide details how these trips have been estimated. The detailed CLP document should include a more detailed construction trip generation analysis.
- The Outline CLP should include a description of the contractors and drivers handbook, and state the information which will be included in these handbooks. Further information regarding these handbooks can be found in TfL's Construction and Logistics Plan Guidance.
- The outline CLP should also confirm the data that will be collected through monitoring of the CLP, and provide details how complaints and safety issues will be managed.

Non-residential Travel Plan

The applicant should confirm how the whole development is likely to be managed once constructed. For example; clarification if the applicant is likely to take an active role in any day to day management of the whole development should be provided.

The Travel Plan should be amended to state the responsibility to achieve the site-wide Travel Plan target is with the applicant. The applicant should be obliged to ensure that individual occupiers are notified of the site-wide Travel Plan and Travel Plan targets, by a s106 planning obligation.

The site-wide Travel Plan target shown in Table 4.3 is for a 2 percentage point increase in cycling trips and a 2 percentage point decrease in bus trips over a 5 year period. In line with TfL's Healthy Streets aspiration the Travel Plan targets should be amended for a more ambitious increase in Active Travel trips (walking and cycling). As the development site is adjacent to a Quietway cycling route, the Travel Plan target should be a minimum increase of 5 percentage points in active travel trips.

The Travel Plan should consider and include the following site-wide Travel Plan measures for non residential uses:

- Changing, lockers and shower facilities for all employees of the development.
- Public transport and/or cycle discounts for all employees of the development.

Interim Travel Plan Residential

The Travel Plan should include specific measures to support non car travel to/from the site for mobility impaired residents. For example, by ensuring that all residents are aware that all local buses can accommodate disabled passengers.



The site-wide Travel Plan target shown in Table 4.1 is for a 2 percentage point increase in cycling trips and 2 percentage point decrease in cars trips over a 5 year period. In line with TfL's Healthy Streets aspiration the Travel Plan targets should be amended for a more ambitious increase in Active Travel trips (walking and cycling). As the development site is adjacent to a Quietway route, the Travel Plan target should be a minimum increase of 5% active travel trips.

The applicant should include further measures to promote active and sustainable travel such as participating in (inter)national promotional events (e.g. Bike Week), and providing discounts at local cycle stores.

TfL would welcome a discussion with Southwark Council on the preparation of TPs for approval prior to occupation, or the commitment of further measures to promote active and sustainable travel and discourage car trips, which the Council may wish to secure by condition and/or in the 106 agreement. TPs should be produced following TfL's guidance (see <https://tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>).

Mayoral Community Infrastructure Levy (MCIL)

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1st April 2012. All new developments that create 100 m² or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in LBS.

Summary

Below is a summary of the key issues:

- TfL have identified an indicative location for a medium size cycle hire docking station in the vicinity of the development. TfL will seek a £200,000 s106 contribution from the applicant to implement a new medium cycle hire docking station within the next 5 years.
- Bus use is likely to be high for the proposed development, considering the distances to the nearest LU and Mainline Rail stations. Therefore, TfL will seek a contribution of £90,000 from the applicant to be included in the s106 agreement, which TfL can draw upon should there be a bus overcrowding issue over a 5 year period from first occupation.
- The proposed development will provide new routes through the site and will attract new residents and visitors to the area. TfL therefore request a contribution of £15,000 payable to Southwark to be included in the s106 agreement towards the provision of new Legible London signage and the updating of existing signage in the area.
- The applicant should provide a detailed breakdown of proposed cycle parking provision to demonstrate cycle parking can be provided in accordance with the draft London Plan standards and the London Cycle Design Standards.
- Residential cycle parking provision should provide 5% of all long stay cycle parking spaces in the form of Sheffield Stands to accommodate larger cycles and users who are unable to use two-tier stands.
- The applicant should confirm the form of proposed cycle parking for non-residential uses. It is recommended that some spaces are made available for larger type of cycles.
- The proposed development includes 18 disabled parking spaces. However, the applicant should demonstrate disabled parking provision can be accommodated for



up to 10% of the total number of residential units (i.e. 50 spaces) should demand arise in the future

- New public realm routes through the site should be accessible to the public 24 hours a day, 7 days per week, and should be accessible for both pedestrians and those cycling. However they should be designed to prevent their use by vehicles as short cuts.
- The masterplan drawing should be amended to show the existing bus shelter on Wells Way at the southern limit of the site. The residential bin store should be relocated away from the bus stop, and there should also be sufficient footway width to accommodate the bus stop. Footways along the site boundary should have a minimum of 2.0m clearance when taking into account street furniture and trees, in line with Streetscape Guidance.
- The non-residential Travel Plan should be amended to state the responsibility to achieve the site-wide Travel Plan target is with the applicant, and the applicant is obliged to ensure that individual occupiers are notified of the site-wide Travel Plan and Travel Plan targets, by a s106 planning obligation.
- Both residential and non-residential Travel Plan's should include more ambitious targets to increase 'active travel' i.e. walking and cycling.
- The Outline CLP should be amended to include using a construction staff travel plan as a proposed measure and should include details on monitoring, and contractors and drivers handbooks.

I hope these comments are helpful. Please do not hesitate to contact me if you would like any clarifications on the issues raised above.

Kind Regards,

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