

Committee	STRATEGIC PLANNING COMMITTEE <b>(ADDENDUM)</b>
Report Title	164-196 Trundleys Road and 1-9 Sandford Street, SE8 5JE
Ward	Evelyn
Contributors	David Robinson
Date	23 March 2021

Reg. Nos.

**DC/20/117966**

## **1.0 INTRODUCTION**

- 1.1 This report has been prepared as an updated response has been provided from Transport for London (TfL) and additional / amended conditions and S106 obligations are proposed.

## **2.0 ADDITIONAL RESPONSE (TfL)**

- 2.1 The updated response from TfL is summarised as follows:

### Healthy Streets

- 2.2 It is noted that the applicant has updated their Healthy Streets assessment. It is noted that the applicant has identified a number of improvements that they will implement. These are:

- Improvement works along the frontages of the site and provision of dropped kerbs/tactile paving at vehicular accesses;
- Improvements to crossing facilities on Trundley's Road;
- Lighting for the railway bridge; and
- £30,000 contribution towards resurfacing works to the east of the site to better connect with Cycleway 4

- 2.3 It is noted that the applicant has identified a contribution of £50,000 towards cycle hire. This is welcomed subject to outstanding cycle parking matters being sufficiently addressed and an appropriate level of contribution towards other walking and cycling improvements being secured.

### Public Transport

- 2.4 In regard to the bus contribution, as you are likely aware the PTAL for this site is poor and the 225 is one of the two services that is within PTAL distance of the majority of the site and is currently well-matched for demand. Therefore, any additional demand would need to be mitigated. It is also useful to highlight that the 225 may not necessarily go where students or residents may wish to travel to. A contribution of £270,000 to cover a 3-year period can be considered. We would like to ensure that there is some flexibility incorporated into the S106 so there is an option to review what would be the best approach to addressing bus demand from this development upon its receipt.

### Trip Generation Assessment

- 2.5 It is noted that the applicant has stated that they do not agree with TfL's comments on the trip generation assessment for the Higher Education establishments. It is

noted that the proposed development is not to be affiliated with any higher education establishments, therefore students at this site could choose to any establishments, although it is assumed that those in central and inner east London are most likely. It is also useful to note that there are no educational establishments within reasonable walking distance – the closest, Goldsmiths University, is 1.3km away and thus outside of reasonable walking distance and furthermore the route along Sanford Street, in particular the lack of natural surveillance due to limited active frontage in locations (please see below screenshots), could act as a deterrent especially when it is dark or quiet. The 225 would then be an attractive option – and similarly when it is cold and wet. The next nearest is the Trinity Laban some 2.9km away in Deptford again via areas/routes which are likely to be perceived as risky and the Camberwell College of Art even further away 3.5km away. It is noted that the applicant has made reference to Ravensbourne, which is 6.3km away from the site.

- 2.6 It is therefore reasonable to assume that residents from this development will utilise the public transport network, in particular buses given the distance from existing rail stations, to access educational establishments. Therefore, TfL's previous concerns that the trip generation assessment underestimated the impact on the surrounding public transport network still remain.
- 2.7 The cost savings of cycling is acknowledged, and it is agreed that some students may choose to cycle to their educational establishment. However, it is still considered likely that students and/or residents from this development will use buses, particularly when they have a bus stop directly adjoining the site and on cold or wet days. The issues of natural surveillance and personal safety apply to cyclists as well as those walking. Furthermore, in the absence of a nominations agreement there is even more chance that students at this site would attend an establishment outside reasonable cycling distance and/or that was easier to travel by public transport. It is noted that the application proposes only the minimum standard cycle parking and there is a commitment towards some improvements to the local walking and cycling network. For other student halls of residence proposals a much lower cycle mode share has been agreed by all parties despite their better location for cycling and it has been pointed out by the universities that foreign students in particular are unlikely to want to buy a bike and they make up a higher than usual proportion of students in halls as they will not be living at home and are less likely to get a flat or house share.
- 2.8 In light of the above, TfL's comments on the submitted trip generation assessment remain outstanding.

#### Vehicle Access

- 2.9 It is noted that additional detail on the vehicle accesses can be secured through condition, and that these accesses are to be delivered as part of a S278 agreement. It is also note that the proposed plans show level footways at vehicle crossovers on the site frontage. It is understood that a Stage 2 RSA will be carried out.

#### Delivery and Servicing

- 2.10 As part of the delivery and servicing activity at this site a loading bay on Sanford Street is proposed. After further review, it is considered that the loading bay will not impact on bus operations. It is however requested that there are measures in place which ensure that delivery and servicing does not occur along other areas of Sanford Street, in particular the bend on this street, as this will have a detrimental impact on bus operations.

### Cycle Parking

- 2.11 The applicant has stated that the lobby adjacent to the commercial cycle parking is to access the student accommodation. They have also stated that cycle parking for the student accommodation and commercial aspects of the development are to be kept separate for security reasons. It is TfL's preference that cycle parking all long-stay cycle parking provision is accessed via a lobby to ensure that all who choose to cycle are afforded the same level of protection as those who do not.
- 2.12 Sufficient space between cycle parking stands and the wall - which will vary dependent on the type of cycle proposed to use the stand - is required. Is there a condition about cycle parking provision?

### Car Parking

- 2.13 As highlighted in TfL's detailed comments and the Stage 1 comments, there is a concern that the overprovision of disabled person parking provision at this site could result in the misuse of these spaces for general parking. It was therefore recommended that the area was designed to provide 3 per cent for the residential element and appropriate quantum for the commercial and student uses from the outset, with the additional areas uses for other purposes (ie additional storage) until the demand for disabled person parking spaces arise.
- 2.14 It is noted that three disabled persons' parking spaces are proposed for the student accommodation. As highlighted in Paragraph 29 of the Stage 1 report, it is a requirement that the majority of student bedrooms are secured via nominations agreement to a specific higher educational institution. It is understood that a nominations agreement has not yet been secured. The identification of a higher educational provider will offer the opportunity to develop a strategy to address parking provision for students who have mobility impairments, in line with the provider's specific needs and policy. The appropriate quantum of on-site disabled person parking provision can be considered as part of this strategy.
- 2.15 It is noted that all spaces on the site will have active charging facilities, which is welcomed.

### Construction

- 2.16 It is understood that a Construction Logistics Plan (CLP) is to be secured through condition.
- 2.17 Should permission be granted, the applicant is encouraged to engage early with TfL on the proposed construction methodology at this site to ensure that throughout the construction period there is no impact on bus operations or on the adjoining railway lines.

### London Overground

- 2.18 It is noted that a number of conditions were sent across from colleagues in London Overground infrastructure Protection (LOIP). These conditions must be attached to any permission attached to this site.
- 2.19 The applicant states that a Noise Assessment has been submitted as part of this application, and that mitigatory measures identified will be secured through condition

and/or have been incorporated into the design. This document has been shared with LOIP, and further comments on this matter may follow.

### Student Management

- 2.20 It is requested that during student move-in and move-out a marshal is in place to ensure that vehicles do not park and/or obstruct the bus stop.
- 2.21 The Student Management Plan should be secured through condition, and detail measures (including the aforementioned) which will be implemented to ensure that there is no impact on the surrounding transport network, in particular bus operations along Surrey Canal Road and Trundleys Road.

### Travel Plan

- 2.22 It is noted that a Travel Plan is to be secured through condition, which is welcomed. It is recommended that a Travel Plan is submitted for each land use, with measures appropriate to that use identified to support sustainable and active travel in line with the Mayor's strategic mode shift for inner London boroughs which is for 90 per cent of all journeys to be made by walking, cycling and public transport by 2041.

## **3.0 CONSIDERATIONS**

- 3.1 The majority of points raised by TfL have already been secured by condition or S106 obligation as follows:
- Vehicular access and various public realm improvement works (secured by S106 obligation)
  - Delivery and servicing plan (secured by condition)
  - Construction logistics plan (secured by condition)
  - London Overground requirements (secured by conditions)
  - Student Management Plan (secured by S106 obligation)
  - Travel Plan (secured by S106 obligation)
  - Stage 2 Road Safety Audit (secured by S106 obligation)
- 3.2 With relation to the Bus Improvement and Cycle Infrastructure Contribution and in light of the points that TfL have raised in relation to trip generation, the S106 obligations have been amended as follows:
- Bus Improvement contribution - £270,000 to be secured (previously £90,000)
  - Cycle Infrastructure contribution - £50,000 to be secured (previously £220,000)
- 3.3 In light of TfL's comments in relation to the proposed cycle parking, the existing condition (number 42) which secured compliance with the cycle parking details submitted by the applicant, has been amended to a condition requiring all details of cycle parking to be submitted to and approved by the Local Planning Authority (in consultation with TfL), as follows:
- a) *Prior to commencement of development above ground-level, full details of the cycle parking facilities for all uses (long stay and short stay) shall be submitted to and approved in writing by the local planning authority.*
  - b) *All cycle parking spaces shall be provided and made available for use prior to first occupation of the development and maintained thereafter.*

*Reason: In order to ensure adequate provision for cycle parking and to comply with Policy T5 cycling and Table 10.2 of the London Plan (March 2021) and Policy 14: Sustainable movement and transport of the Core Strategy (2011).*

3.4 TfL's comments in relation to car parking are noted, however following discussions with the Council's Highways Officer, it was confirmed that further reducing the quantum of accessible parking spaces provided in favour of was not desirable. It is agreed however that the scope of the Parking Management Plan be amended to include a periodic review if the quantum of parking provided at basement level as follows:

- Parking Management Plan outlining:
  - How the off-street parking will be allocated / managed
  - How informal parking (i.e. in the public realm, and service yard) will be enforced
  - **An annual review of the overall quantum of parking provided at basement level**
  - A periodic review mechanism that ensures any increase in demand for electric vehicles charging is addressed.
  - Details of how parking would be managed on Juno Way

3.5 Additionally, TfL raised comments in relation to the allocation of parking provision for students who have mobility impairments. It is recommended that this is included as part of the required detail of the nomination agreement when secured.

3.6 Given the above, all of TfL's comments within their updated response have been addressed.

## **4.0 OTHER AMENDED CONDITIONS AND S106 OBLIGATIONS**

4.1 Following further review of the proposed development, the following additional conditions are recommended to further ensure the Agent of Change principles are met and that the residential development and commercial units can comfortably co-exist:

### 1. Resident's Information Pack

*Details of a resident's information pack outlining the terms the relationship with the industrial uses at ground floor level, shall be submitted to and approved by the local planning authority prior to first occupation of any residential unit. The approved information pack shall be supplied to all prospective and new occupants of the residential and student use.*

*Reason: To safeguard the amenity of future occupants and to meet the principles of Policy D12 Agent of Change of the London Plan (March 2021).*

### 2. Dust, Noise and Vibration Management Plan

*Prior to the occupation of the commercial units, a Dust, Noise and Vibration Management Plan shall be submitted to and approved, in writing, by the local planning authority. The Management Plan will need to detail the measures taken to reduce the impacts on residential occupants by way of dust, noise and vibration in*

*relation to the operational use of the commercial units. The development shall be undertaken in accordance with the approved plan.*

*Reason: To manage and prevent further deterioration of air quality in accordance Policy T7 Deliveries, servicing and construction and Policy SI 1 Improving air quality and to meet the principles of Policy D12 Agent of Change of the London Plan (2021).*

### 3. Service Yard Use

*The Servicing Yard hereby approved, shall be used for the purposes of servicing the commercial units at ground floor level only. The Servicing Yard shall not be used for other general operational use of the commercial units which must be kept within the envelope of the commercial units.*

*Reason: To safeguard the amenity of future occupants and to meet the principles of London Plan Policy D12 Agent of Change.*

- 4.2 In addition to the above, it is recommended that as part of the nomination agreement secured by S106, that details are provided regarding the protocol for marketing and letting of the affordable student units, and that these are prioritised for students most in need.

## 5.0 CONCLUSION

- 5.1 To conclude, following the updated TfL response, and further consideration in relation to the co-location of residential and industrial uses, the following S106 heads of terms have been amended:

- Parking Management Plan outlining:
  - How the off-street parking will be allocated / managed
  - How informal parking (i.e. in the public realm, and service yard) will be enforced
  - An annual review of the overall quantum of parking provided at basement level
  - A periodic review mechanism that ensures any increase in demand for electric vehicles charging is addressed.
  - Details of how parking would be managed on Juno Way
- Nomination agreement with local higher education institution, to also include:
  - Details in relation to the allocation of parking provision for students who have mobility impairments
  - Details of protocol for marketing and letting of the affordable student units
- Bus Improvement contribution - £270,000 to be secured
- Cycle Infrastructure contribution - £50,000 to be secured

The following conditions have been amended or added:

### 1. Resident's Information Pack (added)

*Details of a resident's information pack outlining the terms the relationship with the industrial uses at ground floor level, shall be submitted to and approved by the local*

*planning authority prior to first occupation of any residential unit. The approved information pack shall be supplied to all prospective and new occupants of the residential and student use.*

*Reason: To safeguard the amenity of future occupants and to meet the principles of Policy D12 Agent of Change of the London Plan (March 2021).*

2. Dust, Noise and Vibration Management Plan (added)

*Prior to the occupation of the commercial units, a Dust, Noise and Vibration Management Plan shall be submitted to and approved, in writing, by the local planning authority. The Management Plan will need to detail the measures taken to reduce the impacts on residential occupants by way of dust, noise and vibration in relation to the operational use of the commercial units. The development shall be undertaken in accordance with the approved plan.*

*Reason: To manage and prevent further deterioration of air quality in accordance Policy T7 Deliveries, servicing and construction and Policy SI 1 Improving air quality and to meet the principles of Policy D12 Agent of Change of the London Plan (2021).*

3. Service Yard Use (added)

*The Servicing Yard hereby approved, shall be used for the purposes of servicing the commercial units at ground floor level only. The Servicing Yard shall not be used for other general operational use of the commercial units which must be kept within the envelope of the commercial units.*

*Reason: To safeguard the amenity of future occupants and to meet the principles of London Plan Policy D12 Agent of Change.*

4. Cycle Parking (amended condition 42)

- a) *Prior to first occupation, full details of the cycle parking facilities for all uses (long stay and short stay) shall be submitted to and approved in writing by the local planning authority.*
- b) *All cycle parking spaces shall be provided and made available for use prior to first occupation of the development and maintained thereafter.*

*Reason: In order to ensure adequate provision for cycle parking and to comply with Policy T5 cycling and Table 10.2 of the London Plan (March 2021) and Policy 14: Sustainable movement and transport of the Core Strategy (2011).*