

From: Hiley Andrew <Hileyand@tfl.gov.uk>
Sent: 17 June 2021 15:55
To: Crosby, Victoria
Cc: Crane Anne; 'Valeria Cabrera'
Subject: Re 21/AP/1361 New City Court, 4-26 St Thomas Street, London

Hi Victoria

Further to my email below, I understand the Stage 1 report and letter for this planning application were issued earlier this week, so please find below TfL comments.

As you are aware, there was extensive negotiations between the Council, TfL and the applicant for the previous planning application on this site (18-AP-4039) and there was a particular concern regarding the servicing arrangements, due to potentially adverse impacts on road safety (Vision Zero) and Healthy Streets environment on the Transport for London Road Network (TLRN). We are pleased to see that this new planning application addresses this issue in the way that was suggested by TfL officers at the time. Other issues raised then remain broadly similar.

The site is very well suited to a high trip generating development, being directly adjacent to the London Bridge station complex, which offers a range of public transport services to and from a wide part of London and the south east. The public transport accessibility level (PTAL) of the site is unsurprisingly the highest possible, at PTAL 6b. The site is also well located for a high cycle mode share, with the recent improvements delivered both by the Council and TfL, such as Cycleway 4 and its temporary extension along Tooley Street and the closure of London Bridge and Bishopsgate to general traffic.

Cycle and car parking

London Plan compliant long stay cycle parking and associated shower and locker provisions would be provided at ground level and Basement Level 1. Policy compliant short stay Sheffield stand parking would also be provided at ground level and a mixture of double stacking racks, Sheffield stands and folding bike lockers would be provided at Basement Level 1 in secure access zones.

Access to the basement for cyclists with bikes would be provided from King's Head Yard via a combined cycle stair ramp with a conveyor system to assist. This would be wide enough to allow two people to pass on the stair. A dedicated shuttle lift would allow cyclists to return to reception once bikes have been stored. There would also be a lift for cyclists unable to use the stairs. Although shallow ramps are preferable to access cycle stores, given the site constraints, the proposed arrangements are acceptable. Access off King's Head Yard would also provide safe space for any queuing that may occur at the highest peak arrival times.

The development is proposed to be car-free except for two accessible parking bays in the servicing area for the use of blue badge holders, which is an acceptable level of provision, noting that the adjacent London Bridge station is fully accessible for all modes. At least one of these spaces should have electric vehicle charging, although given the low number of spaces, active charging provision for both spaces would be supported.

Healthy Streets

The proposed development would provide a pedestrian route between St Thomas Street and King's Head Yard, a movement that can't be made directly now. Coupled with the opening up of the eastern flank wall of the Borough High Street London Underground (LU) ticket hall, discussed further below, this would provide an alternative route for pedestrians from Borough High Street and the LU station entrance to St Thomas Street, which would relieve pressure on the narrow footways of St Thomas Street and Borough High Street at their junction. Both these roads are part of the TLRN. The temporary London Streetspace (LSP) scheme is a response to this very issue, and further crowding can be expected post-pandemic.

In order to promote this new route, a contribution to Legible London should be secured, to allow new signs to be provided within the site, and a local sign map refresh. £22,000 would provide two new signs and four existing sign map refreshes.

The development would also provide the opportunity to contribute to the proposed Healthy Streets improvements to St Thomas Street and Borough High Street frontage, which could include permanent footway widening, footway and carriageway resurfacing, tree planting and provision of a segregated cycle track to allow two-way cycle access, which is currently not possible. This two-way access would enhance cycle connectivity to and from the development, and the permanent footway widening would mitigate the increase in pedestrian demand from the development.

TfL is currently developing the St Thomas Street Healthy Streets scheme, so an appropriate contribution to this would be expected in the s106 agreement, either via a substantial financial contribution or via 'in kind' delivery through a s278 agreement with TfL. Similar requests have been made in respect of other development proposals along St Thomas Street.

The scope and value of the Healthy Street contribution should be subject to further discussion between TfL and the Council.

Public transport impacts

The scale and nature of the proposed development would inevitably increase peak demand on the public transport network. London Bridge National Rail station has recently been transformed in terms of capacity and facilities, and Thameslink project has recently been completed, which transforms on-train capacity and connectivity across a wide part of the south east. National Rail services are, in normal times, crowded in peak periods, but the number of trains and range of destinations mean that the additional development trips should be able to be absorbed. This should however be confirmed by Network Rail.

LU train services are also, in normal times, very busy at peak times, particularly the Jubilee line eastbound and Northern line northbound in the AM peak and vice versa in the PM peak. As with any National Rail terminus LU station, boarders dominate in the AM peak, and alighters in the PM peak. An office development here will improve churn as, relatively more people will alight trains in the AM peak, freeing up space for boarders (vice versa in the PM peak).

The LU station has two entrances, the main one within the National Rail station and on Tooley Street, and a second one on Borough High Street. The developer proposes to open the eastern flank wall of the Borough High Street LU ticket hall to provide direct access to the site from the ticket hall. This is supported, subject to full developer funding, engineering feasibility and appropriate commercial terms. A further benefit of the new entrance is to alleviate footway crowding on the busy footways of Borough High Street and St Thomas Street, so this is considered essential mitigation. As such, the new entrance should be required to be open prior to first occupation of the development.

Bus services at London Bridge tend to be more crowded outbound in the AM peak and vice versa in the PM peak. As such, and given the dominant rail mode share, there is unlikely to be an unacceptable impact on bus service capacity.

Cycle Hire

This and other proposed developments in the vicinity of London Bridge will inevitably increase demand for cycle hire in an area that already exhibits high demand, due to the National Rail station and Borough Market. As such, it would be expected that an appropriate financial contribution would be secured within the s106 agreement to provide additional docking points locally, proportionate to the relative size of the development (i.e. approximately one third of the proposed cumulative new jobs in the London Bridge area). This is likely to equate to a new mid-sized (30 point) docking station at the western end of St Thomas Street or nearby, for further discussion between TfL and the Council. A £400,000 contribution would cover the capital and additional operating cost of this new docking station.

Servicing

A key issue for this site is the limited opportunities for servicing. The current much smaller office is serviced via White Hart Yard. However, this road is very narrow with no segregated footway, and the entrance off Borough High Street is very restricted in height, width and visibility, as it effectively runs through the building frontage on Borough High Street. As mentioned above, TfL and the Council have in the past been very concerned with any intensification of vehicle movements in White Hart Yard, particularly in terms of pedestrian safety on Borough High Street.

On-street loading, generally not supported either by TfL or the Council for new developments, is also particularly constrained on St Thomas Street by the temporary LSP scheme and, in the future, by the provision of a segregated cycle track. Therefore, the provision of on-site servicing in a basement accessed from St Thomas is supported. The detailed design of the access will need to be agreed with TfL as part of the s278 agreement.

The applicant has also committed to reducing service vehicle numbers significantly, through proposed consolidation techniques. These limits on service vehicle movements will need to be binding in any planning permission. Timing restrictions will also be expected, in the weekday AM and PM peaks and possibly weekday lunchtimes, as service vehicles would be crossing the busy St Thomas Street footway and, potentially, a segregated cycle track, as well as passing the extremely busy pedestrian crossing between the station/Shard and Guy's Hospital complex.

A proportion of deliveries by cargo bike should also be required, for example office food deliveries. Personal deliveries at work should be banned via tenancy agreements. These restrictions and monitoring regime should be enshrined in any planning permission and secured through a delivery and servicing plan (DSP), to be submitted for approval by TfL and the Council prior to commencement. The Council has in the past also secured a financial bond for additional remedial measures, should service vehicle numbers exceed the DSP, which is supported in this case.

Construction

Construction is likely to be challenging, given the constrained site, busy surrounding roads and the high numbers of vulnerable users. It will be essential that a detailed construction logistics plan (CLP) is developed in close partnership with, and formally submitted for approval by TfL and the Council, prior to commencement. The requirement for this should be secured in any planning permission. If any part of the TLRN is proposed to be used for construction purposes, early engagement with TfL would be essential.

The site also lies partly over and directly adjacent to LU infrastructure, so any permission should include a standard condition requiring LU approval of construction methodology. A separate development agreement is required with LU to deliver the new station entrance, and this should include asset protection also and should be reflected in the s106 agreement.

Travel Plan

A full travel plan should be required to be submitted for approval by the Council in consultation with TfL. The travel plan should contain stretching mode share targets and practical, funded measures to encourage healthy travel by foot and bike, such as pool bikes and business accounts for Santander Cycles. The Council has a new policy of securing free Santander Cycles memberships for eligible occupiers for around 10% of the occupants, which is supported. Occupiers should also sign up to flexible working hours, to encourage peak spreading of trips. The Council has in the past secured a financial bond for additional active travel measures, should travel plan targets not be met, which would be supported in this case.

Mitigation and conclusions

As outlined above, it would be expected that the development provides the following mitigation:

- £22,000 Legible London signage contribution;
- New LU ticket hall entrance;
- £400,000 Cycle hire expansion contribution;
- Significant Healthy Streets contribution;
- Servicing restrictions and management including during construction, backed by a financial bond;
- Travel plan measures to encourage active travel and off-peak use of public transport, backed by a financial bond;
- Mayoral CIL payment.

Provided this mitigation is secured, we consider that the development would on balance be in accordance with London Plan policy in terms of strategic transport.

I hope you find these comments useful in your determination of the planning application, and please let me know if you have any questions.

Regards
Andrew

From: Hiley Andrew [<mailto:Hileyand@tfl.gov.uk>]
Sent: Thursday, June 10, 2021 5:17 PM
To: Crosby, Victoria
Cc: 'Valeria Cabrera'
Subject: Re 21/AP/1361 New City Court, 4-26 St Thomas Street, London

Proposal: Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,851sqm GEA of Class E(g)(i) office floorspace, 360sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 592sqm GEA Class E(b) restaurant/café floorspace and a public rooftop garden, and 5,190sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works.

Hi Victoria

Thank you for consulting TfL Spatial Planning. As this planning application has been referred to the GLA, in line with the protocol we have agreed with them I will provide you with TfL's comments within 5 days of the issue of the Stage 1 report and letter.

Regards
Andrew

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