Argles James

From: Planning Support
Subject: FW: HGY/2021/3175 - High Road West N17 - Final Transport Planning Comments + Updated Contributions

Sent: 10 March 2022 11:13
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Hi Maurice, Philip,

Below are my final transport planning comments on High Road West, some points are still outstanding as we are awaiting Steer's final response on the revised trip generation and the EIA methodology, and on the outcome of the review of Buro Happold's report on crowd flow and event operations.

Transport Assessment (including Car Parking Management Plan) and Design and Access Statement

Development Proposals

The floorspace and accommodation schedule of the outline element of the proposed development reflects suitable flexibility for a range of land uses, ranging between minimum and maximum parameters. The latter are as follows:

- 280,000sqm C3
- 8,000sqm B2/B8
- 22,000sqm E
- 6,000sqm F
- 8,300sqm Sui Generis
- 5,000sqm as on-plot residential parking

Maximum total: 339,300sqm.

A maximum total of 2,977 residential units are proposed (297 existing properties, hence a proposed uplift of 2,680 units including +747 affordable units). The detailed element of the proposed development, Plot A, comprises 60 dwellings, of which 29 units are proposed to be family dwellings (3+bed units).

Public Transport Accessibility Level (PTAL)

It is noted that 64% of the site falls within PTAL 4, 25% PTAL 5 and 11% PTAL 3.

Active Travel Zone Assessment

The ATZ assessment has been reviewed in detail. The lists of personal injury accidents for each route do not identify accidents attributable to reasons other than human error. However, a number of suggestions have been made, including:

- Review and removal of footway parking where relevant to facilitate pedestrian flows along footways;
- Inclusion of cycle lanes to encourage cycling as a safe mode of transport;
- Improvements to pedestrian crossings with tactile paving, or creation of formal zebra crossings; and
- Improvements to footway and crossing surfacing.

The recommendations have been utilised to identify where highway, walking and cycling infrastructure could be made by means of contributions (see further below).

Cycle Access and Parking (Plot A)

There is now an additional cycle store in Block A1 and two cycle stores located to the rear of Blocks A2 and A3 have been reinstated. Overall and on balance, the design of the cycle parking stores complies with

the London Cycling Design Standards. Details of access, parking and dimensional and spacing requirements would be secured by planning condition.

Cycle Access and Parking (Masterplan)

The masterplan proposes a dedicated cycle route running through the masterplan site in a north-south direction, which avoids the High Road. A connection with the extension to Cycleway 1 is allowed for to the west of the site. Within the site it is understood that the intention is for cycling to be accommodated on carriageway along one-way and two-way vehicle routes as well as through public realm areas. Delineation would be provided along one-way routes and across the public realm, but not along two-way routes. No segregation is proposed.

Haringey Cycling Campaign has submitted an objection to the cycle route proposals and proposes an alternative route via the High Road. The applicant has not fully addressed Haringey Cycling Campaign's concerns around the cycle routes across the masterplan site, notably in terms of alignment and directness.

We have however requested that any contraflow cycle lanes along one-way streets on site be dedicated and segregated (and not just advisory, thus over and above the requirements set in LTN1/20), and likewise that segregation be achieved through public realm areas with forecast high footfall.

The proposed cycle routes would be reviewed in detail at Reserved Matters Application (RMA) stage and the mechanism for this secured via the Future Connectivity and Access Plan in the Section 106 agreement associated with the planning permission, should it be granted.

Car Parking (Plot A)

No general car parking is proposed on Plot A due to spatial constraints. Based on the telephone surveys of existing residents, it is estimated that the 60 units would generate parking demand for 26 vehicles. The proposal is to accommodate that demand on street in the local area in the interim, where sufficient spare capacity has been identified by the parking stress survey.

The Transport Assessment states that the minimum 3% accessible parking provision (resulting in 2 accessible spaces) would be accommodated on street on Whitehall Street from the outset. The ad-hoc provision of additional wheelchair-accessible spaces on street (up to 7%) is accepted. This matter would be managed through the Car Parking Management Plan, to be conditioned. An all on-street parking solution would be a short-term solution until more plots got delivered and some parking for Council housing residents relocated off street/off the CPZ. Any parking occurring on street would require CPZ permits to be arranged by Homes for Haringey on behalf of Plot A residents. This mechanism is to be managed through the Car Parking Management Plan to be secured by planning condition.

Car Parking (Masterplan) and Car Parking Management Plan

a. General

The proposals are for a combination of on-street spaces on public (CPZ) roads, private roads and off-street car parks (on plot). Existing accessible and doctors' bays as well as taxi ranks would be retained, which is welcome. It is indicated that the minimum 3% wheelchair-accessible provision would be delivered from the outset for each plot in the future, and the plan in Appendix F shows the indicative (safeguarded) footprints of delivering the full 10% wheelchair-accessible parking provision. Wheelchair-accessible parking for non-residential uses would also be provided, in line with the London Plan standards.

b. Council Housing

The telephone survey undertaken in May 2021 established a baseline to determine the likely maximum demand generated by future residents housed by Homes for Haringey. As all 500 Council housing units would be provided south of White Hart Lane, it is important that all plots delivered within that area as part of any future Reserved Matters applications make adequate allowance for parking. Based on the existing

parking demand generated by current Council housing residents, if all Council housing residents were offered the right to park, up to 500 x 43% = 215 spaces would be required to meet the likely demand, which would have to be met mostly south of White Hart Lane, in close proximity of the proposed Council homes.

c. Family Dwellings (3+ bed units)

Likewise, it is noted that the whole masterplan would include approximately 16% of family dwellings (based on the illustrative masterplan). Any surplus non-CPZ parking not taken up by wheelchair users living on site should be offered to residents of family dwellings (in the order of priority, Council housing tenants would come in first, then residents of non-Council family-sized units). The priority order and mechanism for reallocation of accessible spaces on temporary leases should be discussed in more detail in the Car Parking Management Plan to be secured by planning condition.

d. Conclusion

Notwithstanding TfL's position on the likely accessible parking demand (1% or 3%), it is essential that, at this stage, a maximum number of car parking spaces across the whole masterplan be agreed, and this is to be capped at the maximum 10% provision as per the London Plan (2021) standard for residential disabled users' parking (a total of 297 spaces). It must be stressed again that the flexibility to have sufficient parking on site must be secured through the safeguarding of the additional 7% accessible parking provision both on plot and on street (public and private highway land). This is all the more important on the southern plots where Council housing is proposed to be located and where that additional demand for non-accessible parking would have to be met.

If future Council housing residents follow the same vehicle ownership patterns as existing ones on the Love Lane estate, and all are granted a right to park, then up to 215 spaces would be required to meet that demand (of which a small proportion would overlap with the accessible provision).

That would therefore bring the total parking provision somewhere in the region of 512 spaces (215+297) (or slightly fewer due to a number of wheelchair users being Council housing and family-dwelling residents). That would equate to an overall car parking ratio of 0.17 spaces per unit across the whole masterplan site. This is broadly in line with what was agreed for the Goods Yard and the Depot application (HGY/2021/1771) which provided an overall car parking ratio of 0.16 spaces per unit with parking provided at basement level.

The principle of carrying out car ownership and parking usage surveys in the future as part of each relevant RMA has been discussed previously, and is supported, however we would not allow subsequent plots and parts of the masterplan to come forward without the maximum 10% provision if no sufficient evidence is provided of a long-term reduction in car ownership amongst Council housing residents and generally occupants of family dwellings. The rationalisation of spaces following the conversion of accessible spaces into conventional spaces is a mechanism to be incorporated into the Car Parking Management Plan.

Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with pockets of PTAL 5 and with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that *"the starting point for discussions should be the highest existing or planned PTAL at the site"*).

The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature, with the exception of Council housing residents relying at least in part on CPZ parking. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.

Car club

A car club viability report has been provided which highlights that Zipcar recommends a total of 10 car club spaces. Car club membership contributions for all residents would be secured via a Section 106 planning obligation.

Residential Person Trip Generation – Car Drivers and Passengers

The adjusted residential car driver mode share associated with work trips has been adjusted from 22% to 3%. Whilst the adjustment is welcome, the justification provided in Table 5.13 is not entirely correct as parking would also comprise Council housing spaces for Council housing residents, for whom a non-negligible amount of car parking is proposed. A substantial part of Council residents have jobs requiring them to drive to and from work, this should be reflected in the mode share by weighting the expected proportion of Council housing residents in relation to the total resident population at the proposed development. Therefore, the residential car driver mode share should be revised upwards based on sensible assumptions related to the actual on-site parking provision and likely use, and other mode share redistributions should be made accordingly. There is scope to encourage a reduction of the car driver mode share over time with the Travel Plans.

The adjusted residential car driver and passenger mode shares associated with education trips are based on the postulate than education-related car trips car would mirror work car trips, however this is likely not the case. As such, the car driver and passenger mode shares should be revised upwards to take account of parents escorting their children to/from school by car and children being driven to/from school as passengers. The modal split from NTS9908 for 2018/2019 (pre-pandemic) shows that the proportion of car or van trips was approximately 20%. The Travel in London Report 14 compares children's travel to/from school before the pandemic and now at schools located in and outside school streets (Figure 5.18), across 36 London schools including a few in Haringey. The results indicate that the proportion of car trips in the make-up of children's mode of travel to and from school ranged from 15% to 22%. That range should be seen as a guide to the likely baseline car driver and passenger mode shares for education trips (combining both education-only and escort trips), as families are more likely to need access to a car and a parking space if living in family-sized dwellings. Other mode share redistributions should be made accordingly.

The adjusted residential car driver and passenger mode shares associated with shopping and leisure trips also underestimate the proportion of trips made by car for big shops (either using a private car or a car club available on site) and day trips outside London. It is stated that capping the mode shares at 3% also matches the expected accessible car parking provision of 3% delivered from the outset, however there would be more spaces on site, including for Council housing residents and a proportion reallocated to residents of family dwellings across all tenures.

More work is still needed from the applicant's transport consultant on the modal splits in relation to car drivers and passengers, to achieve more realistic mode shares. Updating the car driver and passenger mode shares as set out above also means the proposed and net trip generations remain to be revised too.

The proposed delivery and servicing trip generation has been reviewed, more data from TRICS has been supplied by the transport consultant to justify in-house trip rates used for the assessment. The trip generation estimates and peak-hour demand are accepted, alongside the proposed loading bay provision designed to cater for maximum daily demand.

Impact on Bus Services

The initial bus impact assessment methodology was queried and a revised bus impact assessment has been submitted to address this and TfL's further comments. Whilst the number of bus routes has been reduced to take account of TfL's feedback, thus giving a more realistic assessment of the impact on local bus services, there is still no bespoke impact assessment per individual bus service (number of additional passengers per route vs theoretical capacity of typical bus used on a given route). Overall, however, it appears that the impact on each route would be low, but it is for TfL to state whether the revised assessment satisfactorily closes out the matter.

It is accepted that the bus cumulative impact assessment is undertaken internally by TfL.

Crowd Flow & Event Operations

Tottenham Hotspur Football Club (THFC) has raised an objection to the proposed development, namely in relation to crowd flows, safety and management. In particular, spectator flows quoted in the Transport Assessment now appear to be out of date. More recent data should be used to update the assessment.

The applicant has liaised with THFC to further engage and resolve the issues raised by the Club, including in finding an agreeable methodology for the impact assessment. It is understood that the Buro Happold report on crowd flow is being peer-reviewed on behalf of the Council. Discussions are ongoing between the applicant and THFC.

Outline Residential Travel Plan

The baseline surveys would be undertaken within 6 months of first occupation of the first phase or 75% residential occupation, with further surveys undertaken as each subsequent phase is complete and occupied. It should be made clear throughout the document that the trigger for the baseline travel surveys would be within 6 months of first occupation or once 75% occupation has been reached, whichever occurs first.

The forecast residential modal splits in Table 3.1 must be revised in line with the comments made on the Transport Assessment, notably in terms of car driver and passenger mode shares.

Likewise, the targets set in Table 4.1 will have to be revised for the same reasons. Although a reduction in the car driver and passenger mode shares is desirable over time, and in particular over the monitoring period, the decrease may only be in the region of a few percentage points.

References to car parking must reflect that all Council housing residents will be able to access a car parking space if they need one (not just decanted residents). Family parking should also be mentioned in the measures and action plan accordingly.

The Residential Travel Plan would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, interim and operational documents would be sought for Plot A but the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.

Outline Framework (Commercial) Travel Plan

Individual tenants would have to produce their own individual Travel Plans or Travel Plan Statements by using the Framework Travel Plan as a basis, if they are above the minimum threshold for producing a document as per the TfL guidance. They would also be required to have their own Travel Plan Co-ordinators answering to the site-wide, overarching Travel Plan Co-ordinator.

The baseline travel survey would be undertaken within six months of first occupation of each phase of development, at the same time as the baseline delivery and servicing surveys.

The forecast commercial modal split in Table 3.1, derived from the Transport Assessment (Table 5.25), shows an assumed 50-50 split between London Overground and bus services. Owing to the high volume of commercial trips forecast to be made by public transport during the peak hours (in excess of 500 two-way movements), a significant number of trips could potentially be directed to the wrong public transport mode and the impact assessment undertaken in the Transport Assessment skewed as a result.

The Framework Travel Plan and associated documents would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents (including an updated operational Framework Travel Plan and individual Travel Plans/Travel Plan Statements) after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, the

mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.

Outline Delivery and Servicing Plan

The loading bay requirements (based on the maximum parameters) should be derived from the delivery and servicing peak hour and be stated in the Outline Delivery and Servicing Plan (DSP).

For the present hybrid application, both an interim DSP and a Detailed DSP would be sought for the masterplan (including Plot A) to be produced respectively before occupation and post occupation (after the baseline delivery and servicing surveys undertaken within 6 months of first occupation). The mechanism for the DSP as part of future phases to be delivered with Reserved Matters applications would also be secured by planning condition.

The surveys would be carried out at the same time as the baseline travel surveys.

Outline Construction Environmental Management Plan

Revised Demolition and Construction Environmental Management Plan (DEMP/CEMP) would be submitted for each future RMA.

A Detailed Construction Logistics Plan (CLP) would be secured by planning condition for Plot A. Future RMAs would include Outline CLPs as part of revised CEMPs/DEMPs, and Detailed CLPs would subsequently be secured by planning condition associated with each RMA/phase of development.

Cycle storage would be provided on site for site operatives, with numbers to be reviewed against demand on a monthly basis. This is welcome.

It is understood that, at peak, 300 Lendlease and extended supply chain management staff to be present on site full time alongside circa 1,400 site operatives. The maximum number of on-site personnel would therefore be around 1,700 people on two occasions, in 2026 and 2028. The peak HGV traffic per month is expected to be attained in mid-2026 and late 2028 with 7,100 vehicle movements consisting of 4,300 HGV and 2,800 LGV movements. The peak year is expected to be 2028 with 14,780 movements. The Transport Assessment indicated that the impact of construction at peak would lead to fewer vehicles than the existing vehicle trip generation.

Due to the proximity of the site with a number of schools, every effort should be made to schedule deliveries and collections where construction traffic is to pass by schools outside school opening and times (namely 08:00-09:00 and 15:00-16:00). Generally, construction deliveries and collections should also be scheduled outside the local network peak hours. This should be reflected in future documents.

Environmental Statement

Clarification is sought on the definition of ‘interim scenario’. At Paragraph 15.2.7, it is stated that it will be assessed in two future year scenarios (peak demolition and construction phase, and complete and occupied phase), however elsewhere in the document (Paragraph 15.1.5), it is stated that the interim scenario is the scenario whereby only the southern site is developed. What is the scenario whereby both southern and northern sites are developed, and has it not been used as a basis for the environmental impact assessment?

The receptor sensitivities are all set at a ‘medium’ level, which lacks subtlety:

- Pedestrians (including wheelchair users, people with pushchairs and people with mobility impairments) and cyclists are vulnerable road users and their sensitivity should be **high**. Any changes to conditions are likely to have a greater impact on them due to the time and effort required to travel on foot or by cycle.

- Drivers are not the only road users that should be included. As a more general and inclusive term, this category should be renamed 'Motorised vehicle users' (including private car, taxi, bus drivers, delivery and servicing vehicle drivers, construction vehicle drivers and any vehicle passengers but excluding bus passengers). All motorised vehicle users experience delays as a result of changes in traffic flows and changes in routes which may affect only a proportion of their journeys. As such, their sensitivity should remain **medium**, as already suggested.

- Bus passengers' sensitivity should be **medium** as they are sensitive to changes in traffic flows and routes which may affect only a proportion of their journeys.

- Rail users' sensitivity should be **medium** due to localised changes in passenger flows which may affect only a proportion of their journeys.

In Table 15.2, it is stated that, for amenity, fear and intimidation, the affected receptors include pedestrians, cyclists, bus and rail passengers. However, amenity, fear and intimidation do not normally apply to bus and rail passengers as they are already onboard services, only to pedestrians (including before and after using public transport services) and cyclists.

The list of impacts for assessment is fine and in line with the guidance, however as I indicated in early feedback (informal scoping opinion request and formal scoping opinion request – HGY/2021/2960) it would be welcome to assess an additional impact, which is road user on-street parking. As you know, parking is critical in this scheme and the impact of it deserves to be assessed, especially as the on-street parking stock would be significantly altered and a substantial number of on-street parking activity (whether on public or private roads) would be generated. The parking stress surveys carried out as part of the Transport Assessment would be a good starting point to establish a baseline, on which the assessment of the parking impact could be built for future year scenarios.

In light of the revised receptor sensitivities, and the effect scale matrix for the evaluation of significance, all likely significant effects, residual effects and residual cumulative effects should be reviewed to reassess the different impact groups of the proposed development. The review should also take account of the revised multi-modal trip generation assessment in the Transport Assessment (proposed and net alike).

For each impact (severance, delay etc), and in particular if the assessment of the magnitude of impact is qualitative as opposed to quantitative, it is important for the proposed magnitude of impact to be clearly stated, in line with Tables 15.4 and 15.5 of Chapter 15 of the October 2021 ES.

Recommended Section 106 Heads of Terms

- Car-free/capped development – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents

- Car club:
    - Car club provision (10No. on-site spaces)
    - Establishment or operation of a car club scheme
    - Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years

- CPZ contributions to the ongoing review and expansion of existing Controlled Parking Zones – £60,000.

- Section 278 highway works agreement (scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes)

- Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

    - Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
    - Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation
    - Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)

- Residential Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:
    - Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
    - Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household

- Future Connectivity and Access Plan

- Enfield Traffic Management Order contribution - £20,000 (indicatively, based on past applications)

- Walking and cycling/transport infrastructure contributions towards the delivery of the Walking and Cycling Action Plan – £2.21 million, including:
    - Feasibility towards feasibility and design of the High Road (A1010) protected cycle track - £260,000
    - New zebra pedestrian crossing on Church Lane immediately north of Bruce Castle Park's gated entrance - £90,000
    - New zebra pedestrian crossing outside Haringey Sixth Form College on White Hart Lane - £90,000
    - Footway improvements along Pretoria Road North - £50,000
    - Wayfinding and Legible London type signage, to link in with borough-wide signage to Tottenham Hale - £150,000
    - White Hart Lane protected cycle track - £150,000
    - Strategic cycle link to the Lea Valley (including a range of public realm enhancements, traffic calming and greening) – £1,115,000
    - Street lighting and footway improvements (route under the railway bridge on Whitehall Street) outside of S.278 works - £120,000
    - Accident reduction strategy (covering clusters at the following locations: Bruce Grove/High Road, High Road/Pembury Road, High Road/Lansdowne Road/Lordship Lane, High Road/Cedar Road, White Hart Lane/High Road, Brunswick Square/High Road, White Hart Lane/Pretoria Road) - £150,000

Recommended Planning Conditions

- Public highway condition (before/after works)

- Cycle parking and access details

- Detailed Construction Logistics Plan

- Demolition/Construction Environmental Management Plans

- Delivery and Servicing Plan

- Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive, space allocation strategy, wheelchair-accessible car parking)

- Combined Stage 1/2 Road Safety Audits along all shared surface lanes within the masterplan and for all new access points on White Hart Lane, the A1010 High Road, Brereton Road and Whitehall Street

- Basement Vehicular Access Control Arrangements (RMA stage)

- Highway stopping-up and diversion details

Regards,

Stéphane Pietrzak
Principal Transport Planning Officer
Haringey Council
River Park House, 225 High Road, London N22 8HQ