



TfL Spatial Planning Reference: BMLY/23/8
- by e-mail only -

Transport for London
City Planning

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To Agnieszka,

RE: Blenheim Shopping Centre, High Street Penge, London SE20 8RW

Thank you for consulting TfL Spatial Planning on this referable application. From the information submitted, it is understood that the proposal is:

Phased development including demolition of existing buildings to facilitate a mixed-use development providing up to 250 dwellings, up to 2,828sqm of commercial/town centre floorspace and associated communal amenity space, play space, car parking, cycle parking, refuse storage and plant space in four buildings ranging between 3 and 18 storeys; alongside the provision of public realm and new pocket park with associated landscaping improvements (REVISED APPLICATION. Main changes include a reduction in height of Blocks A-E; reduction in the number of units; elevational changes and alterations to landscaping and external amenity provision. Updated relevant supporting information submitted).

I write to provide detailed strategic transport comments on the above application. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

Healthy Streets

The Active Travel Zone assessment (ATZ) has identified several potential improvements on and around the site, notably the existing pedestrian facilities at the site, which link eastwards with the High Street and into the residential area to the west, and the north-south connection between Evelina Road and Burham Close, which lead on to St Johns Primary School and Robin Hood Surgery. Funding towards and/or inclusion in the s278 agreement of other Healthy Streets improvements to the routes to/from public transport and other services and facilities in Penge should also be secured. This is to address deficiencies identified through the ATZ assessment and through other assessments and supporting the car-free residential development and low car parking provision of the other elements. This requirement is in line with Policy T2 part D (1).

Suggested areas for improvements include the footway on the walk to Penge East station and pedestrian crossings between the site and the opposite sides of the High

Street and Croydon Road. Particular consideration should be given to the needs of those requiring step-free access given the limited amount of disabled persons' car parking which is proposed. Works should also consider measures to prevent mopeds serving takeaways on the High Street from accessing the site's new public realm.

Enhanced public realm is proposed at Empire Square and Arpley Square. We note that these are proposed outside of the applicant's ownership boundary and should be secured through a S278 agreement.

As highlighted previously, the retention of parking for Colman House and the existing High Street retail units; the new vehicle access from Evelina Road; and the new on-street loading bays increases vehicle dominance, contrary to Policies T2 and T7.

Appropriate footway widths, landscaping, and natural surveillance in the design of Evelina Road and Burnham Close to encourage safe sustainable and active travel should be ensured by the Council. As currently proposed, these access routes are dominated by vehicle parking and loading areas and do not provide a visually attractive, comfortable, and safe public realm that encourages safe walking and cycling, contrary to London Plan policy, Vision Zero and Healthy Streets objectives.

Any improvements should be secured through the scheme design and section 106 agreement, including 24/7 public access, rights over land in other parties' ownership and control, and the s278 agreement in respect of the public highway.

This development would benefit from new Legible London signs on the High Street and within the site. It is therefore requested that a contribution of £22,000 towards new signs and nearby existing Legible London signage map refreshes, is secured through the s106 agreement. This request is in line with Policy T3, by supporting "walk and cycle wayfinding improvements" in Table 10.1 and Policy T2 "Healthy Streets".

Trip Generation

Our concerns with the trip generation assessment from the previous iteration of the scheme have not been addressed. Without an improved trip generation, TfL cannot determine the impacts on the scheme on public transport capacity and this is contrary to Policy T4.

There are a range of concerns with the assessment:

- For the existing trip generation, the applicant has used TRICS data for Local Shops and Superstores. The local shop data is from neighbourhood centres in Ireland and the Superstores are in Central London and are not comparable in size to this site. These locations are not comparable to this site and are inappropriate to determine existing trips. This data significantly overestimates the existing trip rate, reducing the suggested net impact of the scheme. With a lack of suitable TRICS data, we consider that the applicant should collect multi-modal survey data for the retail elements of the site in order for TfL to assess whether there are any uplift in trips which could impact on the transport network.
- As mentioned for the previous iteration of the scheme, the applicant has assigned mode share trips to the underground mode share, even though there is no underground station within reasonable walking distance. Similarly, the applicant has

included motorcycle trips, even though there is no motorcycle parking as part of this development. These should be re-assigned to other modes. We consider that Census 2011 data is outdated, and therefore recommend that TfL MoTiON data is used.

- For the residential element, affordable housing sites have not been selected. As the applicant is proposing around 30 per cent affordable housing, this should be included in the proposed trip generation.
- We also note that the applicant has stated that if the site is for retail use, most trips will be linked and pass-by trips. This has not been considered in the existing trip generation and therefore, we are concerned that the existing trips have been inflated.
- The train trip rates include overground. In order to assess impacts, information relating to which National Rail stations are considered for trip distribution should also be provided. The trip distribution per station should be presented, and thus the impact on services should also be considered (National Rail and London Overground Stations).

Servicing trip generation

- We note that the delivery and servicing information has been proposed from a Steer database. In order to ensure that a robust assessment has been undertaken, the sites used to determine the trip rates should be provided prior to determination. Cargo cycle deliveries have also not been considered within the servicing trip generation.

In sum, further work is required on the trip generation assessment in order to be acceptable to TfL and for TfL to assess strategic transport impacts.

Cycling

For the residential element, 402 long-stay and 10 short-stay spaces have been proposed, which does not align with the minimum quantity standards required by Policy T5. To meet Policy T5, 410 long-stay and 7 short-stay spaces are required. For the commercial element, 22 long-stay and 82 short-stay spaces have been proposed, which does meet the minimum quantity standards in Policy T5.

Policy T5 also requires compliance with the London Cycle Design Standards (LCDS). Good-quality cycle parking is important in achieving a strategic modal shift to align with Policy T1. We consider that currently the provision is not in line with LCDS. Details of non-compliance are provided below:

- Access to all ground floor cycle stores is through the public realm, which raises concerns over the personal security of users who could easily be followed into these stores or, given that there is only one door, pushed back in when they try to exit. The LCDS recommends that access to residential cyclists' facilities should utilise the communal entrances to improve safety. The way to resolve these concerns is to provide access to cycle stores through the residential lobby or office space of each building. This provides a space, with a high probability of passing foot traffic, for a cyclist to wait before entering the cycle store, affording cyclists the same level of personal security as residents without cycles, or allows them to escape from the store if tailgated in. If this is proved not to be possible at least two access points to each cycle

store should be created to provide a cyclist with an escape route and a choice of access points into the store.

- Two-tier racks with the bottom tier as Sheffield stands are proposed. For this type of stand, 1.2 metre spacings should be provided between stands. This is to ensure that bottom tier cycle parking is accessible and usable.
- The cycle store doors along with bin store doors open outward onto the public realm reducing the footway space. Doors should open inwards. These should be rectified prior to determination.
- It is unclear whether the long-stay cycle parking will include facilities such as lockers and showers particularly for commercial users to align with Policy T5 of the London Plan.

Design amendments are required prior to determination to align with Policy T5.

Car Parking

We do not consider that the re-provision of 24 car parking spaces for the retail element is justified. The London Plan Policy T6 requirement is for a car-free development in this highly accessible location by active and sustainable means. It is also contrary to Policy T1 'Mayor's Strategic Mode Shift target' which aims for 80 per cent of trips in Outer London to be through active modes of travel by 2041. We note that the justification given for the parking is to prevent parking in the surrounding streets; however, we consider that providing parking does not help to solve this problem. Rather, investment in active travel improvements to the site as identified in the ATZ including those to bus stops and the railway station; more and better cycle parking, securing of a travel plan including measures to encourage active travel and the implementation of a CPZ would help reduce parking stress and consequently the traffic attracted by this development. Re-provided car parking would perpetuate both. Therefore, we maintain that these spaces should be removed and instead the space used for improved servicing arrangements and improved cycle parking.

The applicant has stated that they cannot meet Policy T6 to identify how additional spaces equating to seven per cent of dwellings can be provided on-site. We disagree with this assessment; if 24 car parking spaces are being re-provided, these could be repurposed into disabled persons' parking if the need arises.

If the 24 spaces were removed from the site, this would provide a more robust justification for not meeting this policy requirement. As it stands, not meeting the requirements of Policy T6 is not suitably justified.

If seven per cent of spaces cannot be identified, at the very least, the applicant should provide a contribution towards improving step-free access to the site for residents, e.g., step-free improvements to the route towards Beckenham Road tram stop and Penge West NR station, step-free improvements at Penge East and/or Kent House in consultation with Network Rail. This was highlighted for the previous iteration of the scheme.

Delivery and Servicing

We understand that mopeds currently use Arpley Square as a turning and waiting area when taking deliveries from McDonalds and other takeaways on the High Street. Two options to provide moped parking have been proposed. From the plans provided, we support these options to remove parking from Arpley Square and consider that there will be little detrimental impact on the SRN and bus infrastructure. It is understood that no bus stop/cage relocation is proposed. If this is required, TfL would need to be reconsulted. Complementary measures to prevent mopeds parking on Arpley Square should be provided, such as cycle parking or planting.

We note that Arpley Mews/Terrace is planned to be a shared vehicle-cyclist-pedestrian space. We consider that this is contrary to Vision Zero objectives. If this continues to be proposed, robust management measures for servicing vehicles to reduce impacts on pedestrian safety would be required and should be secured in any permission.

Previously, we raised concerns about vehicle access to the Pizza Hut loading bay. The manoeuvre requires vehicles to reverse in and exit in forward gear. This is contrary to the Mayor's 'Vision Zero' approach outlined in Policy T2 (which aims to reduce road danger and eliminate all deaths and serious injuries from London's roads by 2041).

Moving all servicing activity into what is the currently the proposed podium car park would help to reduce vehicle dominance on-site and provide increased opportunity for improved public realm and a site that is further in line with Healthy Streets objectives and London Plan policy.

For the previous reiteration of the scheme, we requested that at least one rapid electric vehicle charging point for the servicing bays are provided to facilitate more sustainable delivery and servicing movement to align with Policy T7.

A full Delivery and Servicing Plan (DSP) is required by Policy T7. This should be secured through condition and developed in line with TfL guidance. The DSP should contain targets to minimise large service vehicle movements and encourage smaller and sustainable means especially at peak times and when the area is busy with shoppers and those walking and cycling. Consolidation/sharing of deliveries should be included.

Construction

A full Construction Logistics Plan (CLP) should also be secured through condition and given the town centre location, should pay particular attention to managing and mitigating impacts on pedestrians, cyclists and buses on the High Street and Croydon Road to align with Policy T7 K and support Vision Zero (Policy T2).

We note that in the draft CLP retail servicing access is proposed via the High Street during construction. The full CLP should demonstrate that there will be no impacts of this on bus operations or bus infrastructure.

This should show vehicle access via Evelina Road and Burnham Close, not via A234 High Street. Swept-path analysis, estimated vehicle numbers and mitigation should all be provided in line with our most up to date guidance. In order to minimise impacts on traffic flow and bus operations, no construction vehicles/equipment, skips, or construction materials should be parked/stored on the SRN at any time. Any pit lane/vehicle holding area on the SRN will need to be approved in consultation with TfL.

All construction vehicles exiting the site must undergo wheel-washing prior to entering the public highway and do so in forward gear.

Generally, contractors should be encouraged to arrive to the site through active modes or public transport where feasible.

All haulage operators associated with construction should meet a minimum Freight Operation Recognition Scheme (FORS) rating of silver. All HGVs must comply with the Direct Vision Standard and HGV Safety Permit scheme.

This should be secured by condition and/or s106 as appropriate.

Travel Plan

A full Travel Plan (TP) for both elements of the scheme should be secured. This should contain targets for higher mode shares for active travel in line with London Plan policy T1 and the Mayor's Transport Strategy (MTS). Measures, outside of policy requirements, should be provided to encourage a strategic modal shift in this location.

Please do not hesitate to contact me if you would like to discuss the above further.

Yours sincerely

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