



Our ref: City Planning/05 Spatial Planning/03 London plan and planning obligations

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## By Email

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Dear Sir/Madam

## **London Borough of Camden Community Infrastructure Levy ~ Partial Review of Charging Schedule.**

Thank you for the invitation to comment on the London Borough of Camden Community Infrastructure Levy (CIL) revised charging schedule. I am responding on behalf of Transport for London and the comments here are based upon the proposed charging schedule and the supporting documents, including the CIL Viability Update Report (September 2019), Infrastructure Study (2015) and CIL Strategic Funding List (2016). This response reflects TfL's role as a strategic transport infrastructure and service provider.

The Mayor's adopted Charging Schedule (MCIL2) came into effect on 1 April 2019. I am pleased to note that MCIL2 has been taken into account by BNP Paribas in their Viability Update Report, and subsequently, in the rates proposed in your revised charging schedule.

Public and active transport infrastructure is vital to support 'good growth' across London, and CIL will continue to play an important role in funding infrastructure to support new development. TfL broadly supports the approach you have set out, although I have noted that the supporting infrastructure documents do not seem to place the same emphasis on public transport, walking and cycling improvements as is set out in your Local Plan, LIP3 and other policy documents. For example, where general terms such as 'transport infrastructure' or 'highways improvements' are used in the Strategic Funding List, it would be helpful if these explicitly stated that walking, cycling and public transport are the priority modes to reflect the overall borough approach.

In relation to the supporting infrastructure evidence, we make the following specific comments:

### Infrastructure Delivery Plan (IDP) and CIL Strategic Funding List (SFL)

I have noted the significant funding gap that underpins the revised Camden CIL charging schedule. Whilst I am aware that the purpose of the funding gap is to meet one of the two key tests set out in the CIL regulations 2010 (as amended), the supporting infrastructure evidence is, in some cases, almost five years old. Several projects listed in the SFL, for example, have delivery dates that are in the past (e.g. Freight Consolidation Centre, 2017). You may wish to use this as an opportunity to review the documents and update them to reflect current timeframes, budgets and priorities.

Several key transport projects, namely 'bus improvements' and 'Camden Town' and 'Holborn station capacity works' have been identified in the SFL for removal. As stated above, CIL is becoming more and more important in ensuring the delivery of these types of projects and we oppose the deletion of these projects for the following reasons:

- Bus improvements in Camden Town: whilst the existing network provides sufficient capacity to meet demand, work to consider highway changes on Camden High Street to allow two-way bus operation would significantly improve public transport access to the town centre's shops and markets.
- Camden Town station improvements: this scheme is currently on hold due to a funding shortfall; however, TfL remains committed to the project.
- Holborn station improvements: this scheme has been re-phased due to the financial challenges TfL is currently facing; however TfL remains committed to the project.

Given the above, I consider that these projects should be retained in the SFL.

I am aware that LB Camden has been awarded funding through the Liveable Neighbourhood programme and Holborn is described as the key transport objective following completion of the West End Project in spring 2020. It is a complex and challenging gyratory and will require significant resources. We support the inclusion of a possible contribution towards this scheme, although note that the delivery date needs to be updated.

As a general point, you may wish to consider the potential benefits of taking a more holistic approach to delivery across different infrastructure categories. For example, health and community infrastructure projects could be viewed in the wider context and interventions that will increase walking cycling and outdoor recreation could be considered in addition to capital works. The Surma Centre and Highgate Newtown Community Centre projects for example, could include references to public realm improvements that promote walking and cycling and

discourage use of cars to enable healthier lifestyle choices. In addition, considerable CIL resources are being used in the borough to improve schools and provide additional places where necessary. As part of these projects, you may wish to consider improving the local 'Active Travel Zone' (ATZ<sup>1</sup>) around schools, enabling children and their carers to use sustainable modes of transport.

Finally, I have noted that spending strategic borough CIL on feasibility work for potential road closures has been explicitly excluded from the SFL. Feasibility work does not have to be expensive or yield tangible results slowly. It can be highly beneficial, for example in researching whether a temporary traffic ban could be made permanent and it can also help unlock other funding sources. It seems unnecessarily restrictive to remove the possibility of using CIL funding in this way and I suggest you consider allowing for the possibility, based on the merits of each individual case.

I hope that you find these comments useful and please contact me if you wish to discuss anything further.

I would be grateful if you could note our request to be notified of any further consultations on your revised CIL charging schedule and when you submit the charging schedule for examination.

We do appreciate that local authorities are faced with numerous competing priorities for CIL funding across London, however, we would welcome the opportunity to work with you on updating the infrastructure evidence base and any proposals to improve public transport, cycling, walking and wayfinding infrastructure in Camden through CIL.

Yours sincerely



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<sup>1</sup> ATZ is defined as a 20 minute cycle around a site (using webcat). For more information on ATZ see <http://content.tfl.gov.uk/atz-assessment-instructions.pdf>