Fox Court, Camden

Transport Assessment

November 2023

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Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Date	Prepared by	Checked by	Approved by
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Comments

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1. Introduction

General

1.1. Waterman Infrastructure & Environment Ltd ('Waterman') has been appointed by Clare Real Estate (14 Gray's Inn Road) Limited (the 'Applicant') to prepare a Transport Assessment (TA) in support of an application for the proposed refurbishment and extension at Fox Court, London, WC1X 8HN (the 'Site'). The proposals seek to increase the existing floor area by 9,652sqm (GEA).

1.2. The local planning and highway authority are the London Borough of Camden (LBC).

Background

1.3. The existing site is occupied by a nine-story building providing circa 15,319sqm GEA floor area of office use. The office is partially occupied with Citibase on ground and first floors and HM Courts & Tribunals Services occupying the fourth and fifth floors. The remaining floors (second, third, sixth and seventh) are currently vacant. There is currently a basement car park with 26 parking spaces.

1.4. The Site is bound by A5200 Gray's Inn Road to the west, Brooke Street to the east, a commercial building to the south and a mix of commercial / residential buildings to the north.

Development Proposal

1.5. A description of the proposed development is provided below:

'Demolition of existing facades, retaining existing reinforced concrete frame and basement structures; refurbishment and reconfiguration of the existing office (Use Class E) building for continued office use including extensions with new facades to the west elevation fronting Gray's Inn Road (9 storeys), to the northern courtyard elevation facing Brookes Court (9 storeys), to the existing 5 storey north-east wing fronting Brook Street (3 storeys) and to the south elevation (8 storeys); external alterations, provision of rooftop amenity terraces, landscaping and associated works'

1.6. The development proposals are for the refurbishment and extension of the existing office building to provide a total of 24,971sqm office floor area (GEA). The proposals will increase the existing floor area by 9,652sqm GEA.

1.7. The existing car park will be removed and repurposed for cycle parking and other ancillary features. Cycle parking will be provided in accordance with the London Plan 2021 and LBC standards.

1.8. The proposed development is located within a 'Central Activities Zone' and is identified as being Inner London. The Site layout plans are provided at Appendix A.

Healthy Streets

1.9. The proposed development will align with TfL's core principles of healthy streets and active travel. *Healthy Streets* is an approach for creating fairer, sustainable and attractive urban spaces which will promote the use of walking, cycling and public transport over car use.

1.10. The development is well located to comply with the principles of the Healthy Streets approach due to the Site's location in central London, close to London Underground and National Rail stations and bus stops, as well as marked/signed cycle routes and high-quality pedestrian infrastructure.

1.11. The proposals will remove the on-site car parking and will encourage active/sustainable travel as the primary mode of travel.

1.12. This Transport Assessment (TA) has been prepared in-line with Transport for London's (TfL) Healthy Streets Guidance and includes an Active Travel Zone (ATZ) assessment of the walking and cycle routes to key destinations from the site.

Document Structure

1.13. This TA has been prepared to provide supporting information to a planning application to LBC. Following this Introduction, the document is structured as follows:

- Section 2 – Relevant Policy and Guidance;
- Section 3 – Transport Planning for People;
- Section 4 – Site and Surroundings;
- Section 5 – Proposed Development;
- Section 6 – Active Travel Zone Assessment;
- Section 7 – Trip Generation; and
- Section 8 – Summary and Conclusions.

2. Relevant Policy & Guidance

General

2.1. The development proposals have been assessed against the following national, regional and local planning documents:

- National Planning Policy Framework (NPPF, 2023);
- London Plan (2021);
- Mayor's Transport Strategy (2018);
- TfL Healthy Streets TA recommended Contents and Chapters (June 2019)
- Camden Local Plan (2017);
- Camden Planning Guidance – Transport (January 2021); and
- Transport Classification of Londoners report (2017).

Development Plan Policies

National Planning Policy Framework (NPPF, 2023)

2.2. The current National Planning Policy Framework (NPPF) sets out several transport objectives in Section 9 '*Promoting Sustainable Transport*' designed to facilitate sustainable development and contribute to a wider sustainability by giving people a wider choice about how they travel.

2.3. Paragraph 110 states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

2.4. Paragraph 111 continues that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

2.5. In terms of planning applications NPPF states at paragraph 112(a) that development should:

"a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas, and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use."

2.6. Paragraph 113 covers the need for Travel Plans and Transport Statements / Assessments for all developments which generate significant amounts of movement.

2.7. As shown later in this report, the proposed development is in an area of excellent public transport accessibility, is able to accommodate the delivery of goods and export of waste and have been designed to promote trips on foot, by cycle or by public transport. It can therefore be concluded that the proposed development is in accordance with the NPPF.

London Plan 2021

2.8. The London Plan is the overall strategic plan for London which covers the period 2019 to 2041. The document provides a long-term view of London's development to inform decision making.

2.9. Policy T1 'Strategic Approach to Transport' states:

"a) Development Plans should support, and development proposals should facilitate:

- The delivery of the mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2041; and

-The proposed transport schemes set out in Table 10.1.

b) All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking, and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated."

2.10. Policy T2 'Healthy Streets' states:

"Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

Development Plans should:

- Promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience, and amenity; and support these outcomes through sensitively designed freight facilities.

- Identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently, and streets are greener and more pleasant.

- In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.

Development proposals should:

- Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.

- Reduce the dominance of vehicles on London's streets whether stationary or moving.

- Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

2.11. Policy T4 ‘Assessing and mitigating transport impacts’ asserts that:

“When required in accordance with national or local guidance, transport assessments / statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide, and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance;

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address any adverse transport impacts that are identified;

Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed Developments, and no firm plans, and funding exist for an increase in capacity to cater for the increased demand, planning permission may be contingent on the provision of necessary public transport and active travel infrastructure;

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated;

Development proposals should not increase road danger.”

2.12. Policy T5 ‘Cycle Parking’ states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through the provision of appropriate levels of cycle parking, which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards which have been set out below in Table 1 for office use (Use Class B1).

Table 1: Minimum Cycle Parking Standards (The London Plan 2021) – Office Use

Use Class	Long-Stay	Short Stay
B1 – Office (use class E)	1 space per 75 sqm	First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm (GEA)

Source: The London Plan (March 2021)

2.13. Policy T6.2 ‘Office Parking’ sets out maximum office parking standards based on the development location. The standards relevant to the development site are set out in Table 2.

Table 2: Maximum Office Car Parking Standards (The London Plan, 2021)

Location	Maximum Parking Provision
Central Activities Zone and Inner London	Car free

Source: The London Plan (2021)

Mayor’s Transport Strategy (MTS) for London (March 2018)

2.14. The MTS was published in March 2018 after a detailed public consultation. The document sets out the policies and proposals to reshape transport in London over the next two decades.

2.15. Central to the new strategy is the 'Healthy Streets Approach', which seeks to prioritise human health and experience in planning the city, and thus change London's transport mix so the city works better for everyone. As such, the key themes of the strategy are:

"Healthy Streets and healthy people- Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

A good public transport experience- Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.

New homes and jobs- More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone."

TfL Healthy Streets TA recommended Contents and Chapters (June 2019)

2.16. This document sets out TfL's expectations in terms of information to be provided within Transport Assessments to support development planning applications. It places emphasis on supporting Healthy Streets, Vision Zero and the Mayors Transport Strategy.

Camden Local Plan (2017)

2.17. The Camden Local Plan was adopted in July 2017. The document sets out the vision, objectives, strategy and policies for the borough.

2.18. With regard to promoting sustainable transport, Policy T1 states that:

"The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Walking

In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

a. improve the pedestrian environment by supporting high quality public realm improvement works;

b. make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;

c. are easy and safe to walk through ('permeable');

d. are adequately lit;

e. provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and

f. contribute towards bridges and water crossings where appropriate.

Cycling

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

g. provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;

h. provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning Camden Local Plan | Transport 301 document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;

i. makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;

j. is easy and safe to cycle through ('permeable'); and

k. contribute towards bridges and water crossings suitable for cycle use where appropriate.

Public Transport

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate. Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort."

2.19. Policy T4 regards to sustainable movement of goods and materials and states:

'"The Council will promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road. We will:

a. encourage the movement of goods and materials by canal, rail and bicycle where possible;

b. protect existing facilities for waterborne and rail freight traffic and;

c. promote the provision and use of freight consolidation facilities.

Developments of over 2,500 sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to:

d. minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;

e. accommodate goods vehicles on site; and

f. provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate."

Camden Planning Guidance – Transport (January 2021)

2.20. The Camden Planning Guidance (CPG) on transport has been prepared to support the policies in the Camden Local Plan 2017.

2.21. The document emphasises that new developments in the borough should be car-free and legal agreements should be used to maintain car-free and car-capped development over the lifetime of a scheme.

2.22. With respect to cycle facilities, the document states the following key points:

‘’-The Council will seek high quality cycle parking facilities for development, including redevelopments and in applications that change travel patterns and the travel profile or increase the numbers of people travelling to a site;

-Applicants must provide, as a minimum, the quantity of cycle parking spaces as set out in the London Plan; and

-Applicants will provide cycling facilities that are fully inclusive and accessible by step free access.’’

2.23. The document also advises that the council expects new developments to provide an additional 20% of cycle parking spaces over and above the London Plan standard to support the expected future growth of cycling for people living in the borough.

Transport Classification of Londoners (TCoL) (2017)

2.24. The Transport Classification of Londoners is a multi-modal customer segmentation tool developed by TfL that has been created to categorise Londoners based on the travel choices they make, and the motivations for making those decisions.

Summary

2.25. The key transportation policy is to ensure that new developments are in locations which are or can be made sustainable. Future development should be in accessible locations, which can reduce the need to travel for employment, leisure and education and encourage the use of sustainable transport modes such as walking, cycling and public transport.

2.26. In terms of sustainability, the Site benefits from excellent accessibility to existing bus, underground and rail services and is well connected to the pedestrian and cycle network in London. Parking (car and cycle) will be provided in accordance with all local and regional policy. The Site will therefore provide employees with a realistic alternative to the private car in accordance with policy.

3. Transport Planning for People

General

3.1. This section of the TA summarises the expected characteristics of the future users of the Site, including their likely travel behaviour. The development proposals are for the refurbishment and extension of the existing office building to provide a total of 24,971sqm office floor area (GEA). The proposals will increase the existing floor area by 9,652sqm GEA.

3.2. The main users at the Site will be employees working on-site. It is anticipated the majority of employees will arrive at the site between 08:00-09:00 and will leave the Site between 17:00-18:00 in-line with 'traditional' working hours.

3.3. Hybrid working is now a common practice in London, especially in office development where remote working is easier to facilitate, with staff splitting their time with working in the office and working at home. Flexible working offers for a potential reduction in overall people movement associated with the Site.

3.4. To better understand likely travel habits and attitude to travel, TfL's Transport Classification for Londoners (TCoL) tool, which characterises Londoners based on their travel choices and motivations for their decisions, has been used.

3.5. This section will also show how the development will result in a pleasant and convenient place for people of all abilities to travel to / from by sustainable modes of transport such as walking, cycling and public transport.

Transport Classification of Londoners (TCoL)

3.6. The TCoL is TfL's multi-modal customer (i.e. all travellers) segmentation tool. The tool characterises Londoners based on the travel choices they make, and the motivations for those decisions, to understand their travel behaviour.

3.7. Such understanding enables better transport planning for people in London for now and the future. It should be noted, the TCoL profile mostly relates to residents rather than employees, however the TCoL can give an indication of employee travel habits in a given area.

3.8. The methodology for the TCoL approach involves dividing the population into a set of nine segments. A summary of all nine segments and their characteristics is included in Table 3.

Table 3: Segment Summary of Londoners

Segment	Characteristics
Affordable Transition	low car, high bus, walk, cycle; highest level of change.
City Living	high public transport especially Tube / Active travel; average level of change.
Detached Retirement	very high car; very low levels of change.
Educational Advantage	high public / active transport, low car; higher level of change.
Family Challenge	high bus, average others; higher level of change.
Settled Suburbia	high car; below average level of change.
Students and Graduates	low car; high bus / walk; average level of change.
Suburban Moderation	high car, some bus; average level of change.
Urban Mobility	low car, high cycle / public transport; above average change.

3.9. Information within Appendix B illustrates a map of London, with each area being colour coded with the segment that is most comparable to the area's existing characteristics. The TCoL tool can be used to give an indication on the employee type in a respective area and an insight on their potential travel habits.

London Borough of Camden TCoL Profile

3.10. Appendix B also includes the TCoL segment profiles by borough which indicates that LBC has a relatively high proportion of City Living (24%) as its dominant profile. While this mostly relates to residents in LBC, it also gives an indication to employees working in LBC. This profile has therefore been used to understand the likely travel habits of Site users. This does not mean that the Site will only be designed for this type of user, but it provides a guide to the predominant transport matters that will be important.

3.11. The London Boroughs with the highest segment distribution for the 'City Living' population is Wandsworth, Kensington and Chelsea, Westminster, Camden, and Hammersmith and Fulham. All of these London Boroughs are well connected to the Site via extensive underground links, as well as established cycle routes and are within a reasonable cycle distance from the Site.

3.12. A summary of the travel type for parts of London classified as 'City Living' are that they have very high level of Underground use while also above average use of bus, rail, walking and cycle hire.

3.13. It has been identified that the key motivations that would change travel behaviours are:

- Lifestyle changes;
- Health and fitness;
- Changes to roads and driving;
- Changes to public transport; and
- Money.

3.14. The development therefore focuses on these aspects to ensure that walking and cycling are catered for and access to public transport services is prioritised.

Development Response

3.15. The development is located in an area with excellent accessibility to public transport (PTAL rating of 6B which is the highest achievable), as well as the walking and cycling network. The Sites location will accommodate access by sustainable and active modes of transport for employees located in 'City Living' areas as well as other areas in London,

3.16. To support travel by cycling, the proposed development will provide cycle parking in-line with London Plan 2021 standards, as well as the Camden guidance which promotes an additional 20% of cycle parking above the London Plan standards.

3.17. Cycle parking will also be provided for larger and adapted cycles (5% of the total cycle parking provision in-line with the London Plan 2021 and London Cycle Design Stadnards). Shower and locker facilities will also be provided in-line with London Plan 2021 guidance to encourage employees to cycle to the Site. The proposals will also providing additional and improved landscaping on the pedestrian cut-through from Brooke's Court and Baldwin's Gardens and Brooke's Market Square area.

4. Site & Surroundings

Existing Site & Surrounding Area

Existing Site

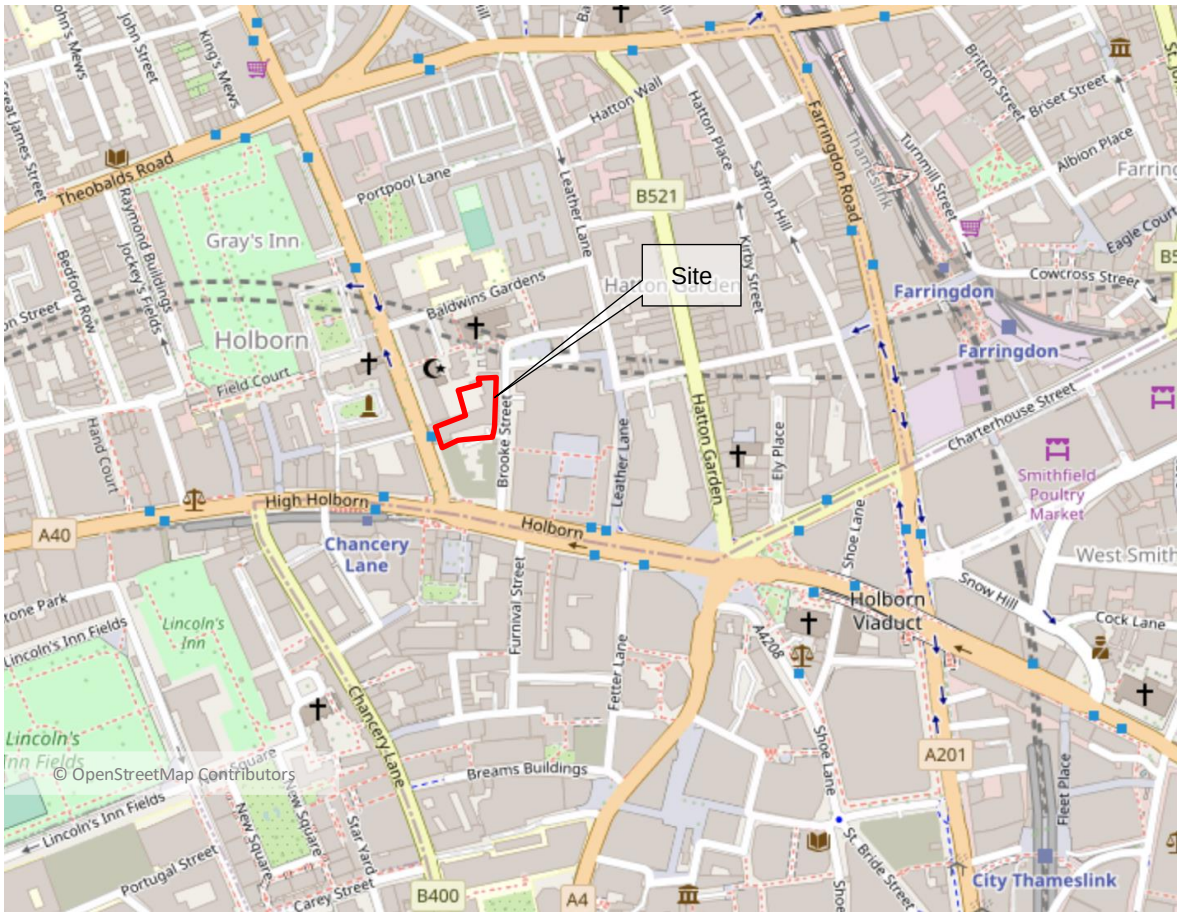
4.1. The existing site is occupied by a nine-story building providing circa 15,319sqm GEA floor area of office use. The office is partially occupied with Citibase on ground and first floors and HM Courts & Tribunals Services occupying the fourth and fifth floors. The remaining floors (second, third, sixth and seventh) are currently vacant. There is currently a basement car park with 26 parking spaces which is accessed via a vehicle ramp from Brooke Street.

4.2. The Site is bound by A5200 Gray's Inn Road to the west, Brooke Street to the east, a commercial building to the south and a mix of commercial / residential buildings to the north.

4.3. The Site is located circa 120 metres to the north of Chancery Lane Underground Station and circa 600 metres to the west of Farringdon Station.

4.4. The local site context plan is shown below in Figure 1

Figure 1: Site Location Plan



Source – Open Street Map

Walking

4.5. Pedestrian access to the Site is currently taken from A5200 Gray's Inn Road and Brooke Street.

4.6. The Site benefits from excellent existing provision of pedestrian infrastructure within the local area surrounding the Site. Existing footways are between 3-6 metres wide, providing a consistent level gradient along both sides of Gray's Inn Road. A Pedestrian Comfort Assessment of the existing footway along the Sites frontage on Gray's Inn Road outlined in Section 5, indicates there is a pedestrian comfort rating of A (a rating of A is classified as comfortable for all areas).

4.7. Several crossing points are available along Gray's Inn Road including a zebra crossing to the north of the junction with Baldwin's Garden and a controlled crossing at the junction with A40 Holborn. There is a Copenhagen Crossing across the Baldwin's Garden priority junction with Gray's Inn Road to aid pedestrian movement. There is also a good provision dropped kerbs and tactile paving at crossing points and street lighting along the road.

4.8. The Chartered Institution of Highways and Transportation ('CIHT') published the guidance document 'Planning for Walking' (2015), which sets out the considered desirable thresholds for a pedestrian walking environment.

4.9. The document defines a 'walkable neighbourhood' as an area with the majority of amenities within 800m walking distance. The document also sets out a desired threshold of 1,600m for walking journeys, although acknowledges people may travel in excess of this as part of commuting trips.

4.10. There are amenities and facilities within 800m walking distance of the Site to meet the future site users day-to-day needs. These amenities are outlined below:

- High Holborn Bus Stop (Stop C) – 50m;
- Gray's Inn Gardens – 100m;
- Chancery Lane Underground Station – 120m;
- Chancery Lane station Bus Stop – 140m;
- Tesco supermarket – 140m;
- Leather Lane Market – 150m;
- M&S Simply Food – 150m;
- Farringdon Station – 600m.

4.11. Overall, the Site is well located to provide access to key local facilities which will meet Site users day-to-day needs.

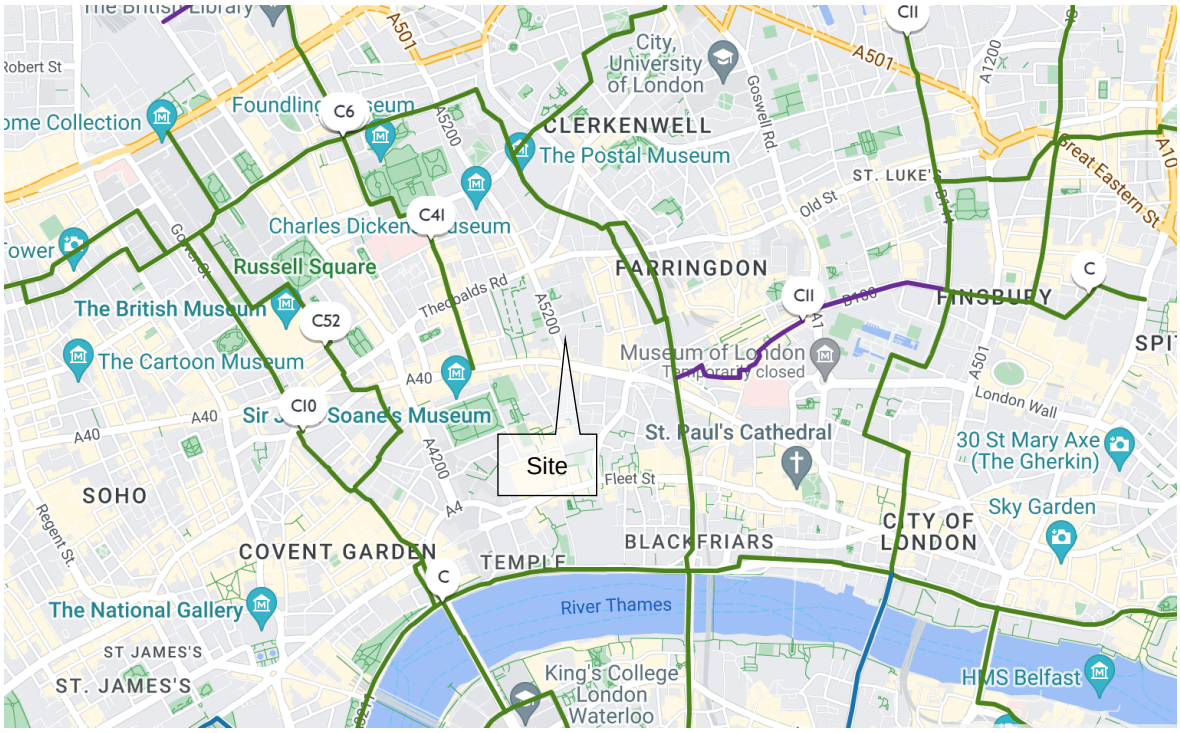
Cycling

4.12. The Site benefits from excellent cycle connections within the surrounding areas. There is a cycle lane along the site frontage on Gray's Inn Road which is mostly segregated from traffic using a mixture of bollards, floating bus islands and 'stepped' cycleways. There are intermittent advisory cycle lanes along A40 Holborn which merge with bus lanes to provides cycles with a route free from traffic except buses.

4.13. Furthermore, Cycleway 6 (C6) and Cycleway 41 (C41) run to the east and west of the Site respectively. C6 runs along Farringdon Street and provides a cycle route from Camden to Elephant and Castle with large sections of segregation. C6 also connects with C3 which runs along the River Thames between Blackfriars Bridge and Houses of Parliament and connects to Cycle Superhighway 7.

4.14. Route C41 provides a link between Holborn and C6 and C27 to the northwest of the Site. An extract from TfL's on-line interactive cycle map is shown in Figure 2.

Figure 2: TfL Cycle Network Map



Source – Transport for London Cycle Map

4.15. Three London Cycle Hire docking stations are provided in the vicinity of the Site accommodating up to 82 cycles, located at the following locations:

- Hatton Garden, circa 280 metres east of the Site – 25 docking stations;
- Holborn Circus, circa 300 metres southeast of the Site – 47 docking stations; and
- New Fetter Lane, circa 400 metres southeast of the Site – 20 docking stations (of which two are E-bike.

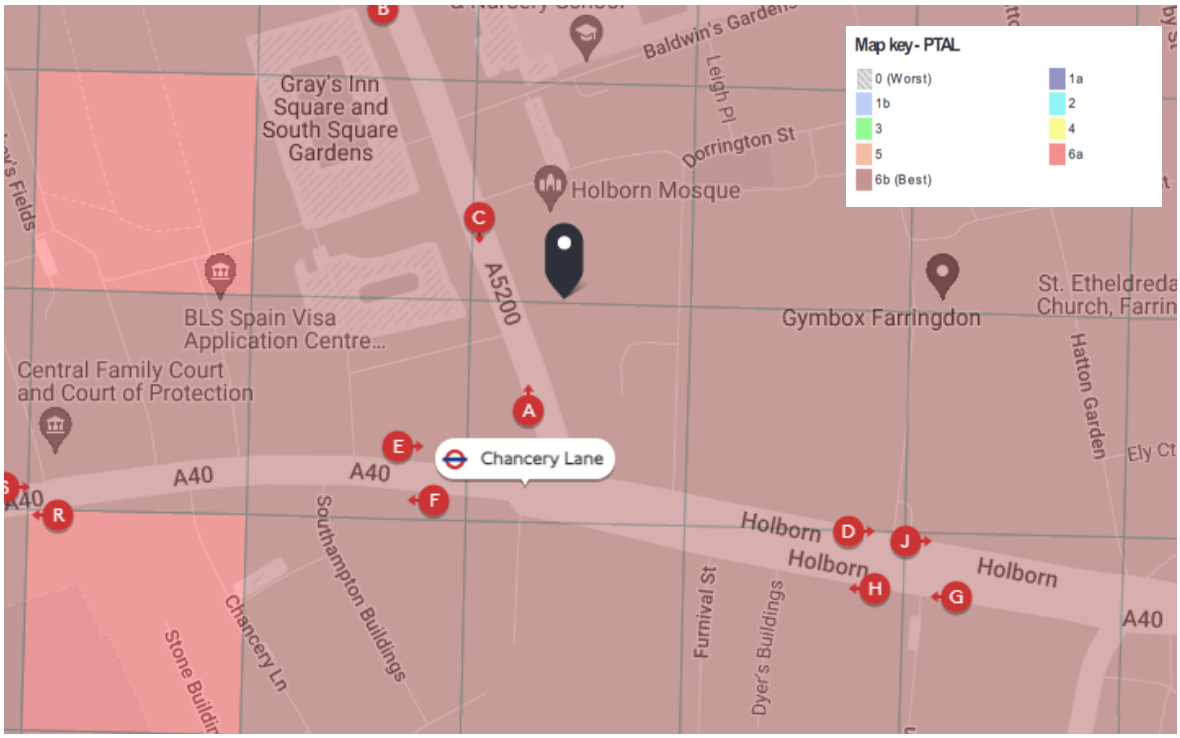
Public Transport

PTAL Assessment

4.16. TfL's WebCAT tool has been used to establish a Public Transport Accessibility Level (PTAL) for the day. PTAL scores range from 0 to 6b, where 6b is the highest score achievable.

4.17. The site is located in an area with a PTAL rating of 6b, the highest achievable. An extract from WebCAT of the Site's PTAL is shown below in Figure 3.

Figure 3: PTAL Output for Area Covering the Site



Source – WebCAT

TIM Mapping and Wider Connectivity

4.18. PTAL does not account for pedestrian and cycle facilities within the vicinity of the Site, nor does it assess the connectivity to other transport modes through multiple journeys.

4.19. TIM Mapping is a tool available on TfL's WebCAT connectivity toolkit website, which measures how far a person can travel in any given journey time using various modes including walk time. The output for the morning peak using public transport is shown in Figure 4 below.

Figure 4: TIM Mapping Journey Time for public transport in the morning peak

Source – Transport for London Cycle Map

4.20. The above TIM Mapping output shows that the majority of Central London can be accessed by public transport, from the Site, within 10-20 minutes.

Bus Services

4.21. Bus stops C (southbound) and B (northbound) are located circa 50 metres and 130 metres northwest of the Site on Gray's Inn Road. Bus Stop C has recently been re-provided, from directly along the site's frontage to circa 50m to the north of the site. The re-provided bus stop C is a floating bus island which allows cycles to bypass a bus stop easier and safer. The stops are serviced by bus routes 17 and 46.

4.22. Furthermore, bus stops E (eastbound) and F (westbound) are located circa 120 metres and 140 metres respectively southwest of the Site on A40 Holborn. The bus stops are serviced by routes 8, 59 and 133 as well as night bus routes N8, N25 and N242.

4.23. These services provide frequent and direct connections to several destinations including London Bridge, Paddington and Waterloo. A summary of daytime services is provided in Table 4.

Table 4: Local Bus Services Operating in the Vicinity of the Site

Service	Towards	Frequency (Buses per Hour)		
		AM Peak	Off Peak	PM Peak
17	Cannon Street Station – London Bridge Station	5-8	5-8	5-8
	Kings Cross Station – Archway Station	5-8	5-8	5-8
46	St Pancras Station – Hampstead Station - Paddington Station	5-8	5-8	5-8
	St Bartholomew's Hospital	5-6	5-8	5-8
8	St Giles High Street	6-10	6-10	6-10
	Liverpool Street Station – Bow Bus Garage	6-10	6-10	6-10
59	St Bartholomew's Hospital	8-12	8-12	8-12
	Waterloo Station – Brixton Station – Telford Avenue	6-9	6-9	6-9
133	Holborn Station	6-10	6-10	6-10
	London Bridge Station – Elephant & Castle Station – Brixton Station – Streatham Station	6-9	6-9	6-9
Total		**58-90**	**58-92**	**58-92**

Source: Transport for London (accessed June 2023)

4.24. Table 4 demonstrates there is a good number of high frequency bus services within easy walking distance of the Site, which connect the Site with several key destinations.

4.25. The local bus stops include a shelter, seating, timetable information, bins nearby and are illuminated by local street lighting.

Underground & Rail

4.26. The Site is located within easy walking distance of two underground and rail stations, including:

- Chancery Lane Underground Station (120m walk); and
- Farringdon Train Station (600m walk).

4.27. Central Line Underground services can be accessed from Chancery Lane. The Central Line provides services towards Loughton/Epping/Hainault to the east and Ealing Broadway/West Ruislip/Northolt/North Action to the west.

4.28. Farringdon Station provides access to Circle, Hammersmith & City and Metropolitan Underground services, Elizabeth Line services and Thameslink Rail services.

4.29. The Site can therefore be considered highly accessible to underground and rail services, with the majority of trips likely being distributed across each of the stations noted above.

Highway Network

4.30. To the west of the Site, Gray's Inn Road is a two-way single carriageway road running on a south-north alignment between a signalised junction with A40 Holborn to the south and a signalised junction with A501 to the north.

4.31. Gray's Inn Road is street-lit and subject to a 20mph speed limit in the vicinity of the site. Double yellow lines and double yellow kerb markings are present on both sides of the road in the vicinity of the Site. Gray's Inn Road is predominantly c.10m wide with footways provided on both sides of the road. The road benefits from the provision of on street and segregated cycle lanes adjacent to the carriageway.

4.32. To the south, A40 Holborn is a two-way single carriageway, running on a broadly east-west alignment. The road is street-lit and subject to a 20mph speed limit in the vicinity of the Site with footways provided on both sides of the road. There are intermittent advisory cycle lanes along A40 Holborn which merge with bus lanes to provide cycles with a route free from traffic except buses.

4.33. Brooke Street to the east of the site provides access to a one-way loop around the Brooke's Market square area via Dorrington Street and Brooke's Market. There is on-street residents parking along Brooke Street, Dorrington Street and Brooke's Market.

Workplace Population Method of Travel to Work

4.34. National Census 2011 data has been analysed to ascertain the 'Method of Travel to Work' percentage modal split for those travelling to the local area for employment. Details of the Neighbourhood Statistics census have been obtained for "Method of travel to work (workday population)" for the output area E02000193: Camden 028 (Table 5).

Table 5: Method of Travel to Work Workplace Mode Split (E02000193: Camden 028)

Mode of Transport	Percentage	Cumulative
Underground, Metro, Light Rail, Tram	37%	83%
Train	34%	
Bus, Minibus or Coach	12%	
Taxi	0%	0%
Motorcycle, Scooter or Moped	1%	1%
Driving a Car or Van	5%	5%
Passenger in a Car or Van	0%	
Bicycle	6%	11%
On Foot	5%	
Other Method of Travel to Work	0%	0%
Total	**100%**	**100%**

4.35. The above table indicates that among those travelling to the area for employment, the most popular mode of travel is by underground and train (37% and 34% respectively), 11% active travel (5% on foot and 6% cycle), and 5% travel car.

Personal Injury Accident (PIA) Data

4.36. An assessment of Personal Injury Accident (PIA) data has been undertaken for the highway network surrounding the Site with reference to collision data collected from TfL for the most recent three-year period (March 2020-March 2023).

4.37. An overview of the extent of collision area obtained is set out below in Figure 5 below, with the recorded PIA incidents summarised in Table 6.

Figure 5: Accident Data

Source: © TfL

Table 6: Personal Injury Accident Data

Severity	2020	2021	2022	2023	Total
Fatal	0	0	0	0	0
Serious	1	1	1	0	3
Slight	3	5	13	0	21
Total	**4**	**6**	**14**	**0**	**24**

4.38. There has been a total of 24 collisions in the period between March 2020 and March 2023, with 21 of these collisions being slight incidents and 3 being serious incidents. Five casualties were cars and eight were motorbikes/mopeds, with 9 casualties being cyclists and only 2 casualties being pedestrians. The low volume of collisions, especially serious collisions indicates that there are no inherent safety issues associated with the surrounding highway network.

4.39. The full TfL Collision output data is included at Appendix C.

5. Proposed Development

Overview

5.1. The development proposals are for the refurbishment and extension of the existing office building to provide a total of 24,971sqm office floor area (GEA). The proposals will increase the existing floor area by 9,652sqm.

5.2. The Site layout plans are provided at Appendix A.

Access

5.3. The primary pedestrian access to the Site will be retained from Gray's Inn Road. The access will lead into the main reception area. There will be step free access for employees and visitors with mobility issues.

5.4. A secondary pedestrian access will also be provided to the rear of the building via Brooke Street. Lifts are available from the reception to all floors.

5.5. Car, cycle and delivery and service access to the site will be taken from the rear of the site from Brooke Street. There will be a separate access for cycles and good and servicing.

5.6. As part of the proposed development, the proposals will extend the Site's façade along Gray's Inn Road for floors one and above. Columns will be introduced within the Site's boundary to support the extended façade. The existing ramp and steps providing access to the site will be removed.

Pedestrian Comfort Assessment

5.7. An assessment of the existing footway widths and the proposed footway widths, as well as the previous footway widths prior to Bus Stop C being moved circa 50m north of the site in 2021 is set out in Table 7, alongside the results of a pedestrian comfort assessment in-line with TfL guidance of the footway widths. The footway widths are shown in Figure 6 below.

5.8. There are no pedestrian counts along Gray's Inn Road, therefore the pedestrian movements along Gray's Inn Road have been based on a pedestrian movement model for streets within the City of London projected in 2026.

5.9. This model showed that streets similar in nature/character would have a pedestrian flow of between 1000-2000 pedestrians per hour, however this was for both sides of the carriageway which equates to 500-1000 pedestrians per hour for one side of the carriageway.

5.10. This was used as an indicator to the pedestrian flows along Gray's Inn Road, and a pedestrian flow of 750 pedestrians an hour was applied to Gray's Inn Road. This pedestrian flow has been used as a relative measure to test how the scenarios vary.

Figure 6: Footway widths along Gray's Inn Road

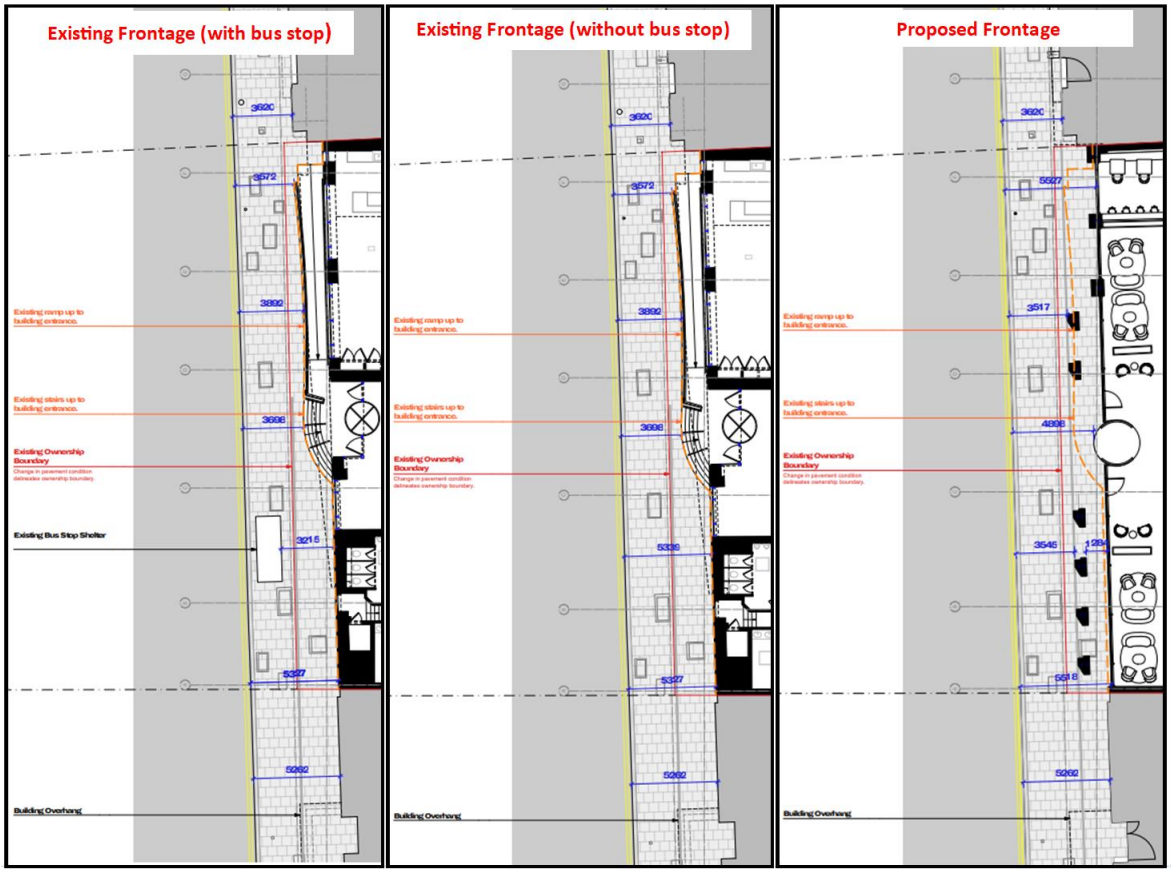


Table 7: Footway Widths and Pedestrian Comfort Assessment Results

Area	Existing (with bus stop)			Existing (w/out bus stop)			Proposed (new façade)		
	Width	PCL	PPMM	Width	PCL	PPMM	Width	PCL	PPMM
A	3.620	A	4	3.620	A	4	3.620	A	4
B	3.572	A	4	3.572	A	4	5.527	A+	2
C	3.892	A	4	3.892	A	4	4.7[1+2]	A	3
D	3.698	A	4	3.698	A	4	4.898	A	3
E	3.215	A	4	5.339	A	3	4.818[2]	A	3
F	5.327	A	3	5.327	A	3	5.518	A+	2
G	5.262	A	3	5.262	A	3	5.262	A	3
Average	**4.09**	**A**	**3.71**	**4.39**	**A**	**3.57**	**4.91**	**A**	**2.86**
Improvement			-			+4%			+23%

Note 1: Footway width includes footway between column and building edge.

Note 2: 0.7m subtracted to account for column width.

5.11. Table 7 above shows that the average footway width along Gray's Inn Road is currently wider and will remain wider with the proposed development than the footway prior to Bus Stop C being moved in 2021.

5.12. The methodology considers the following key criteria (amongst others) as part of the assessment (quoted from the TfL guidance):

- *Clear Footway Width - This is the space left for walking after the standard wall and kerb buffers and any street furniture is taken into account;*
- *Crowding - Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute (ppmm) and is calculated using the following formula: people per hour ÷ 60 ÷ clear footway width in m; and*
- *Pedestrian Comfort Level Categorisation - The crowding level (ppmm) is then categorised according to the Pedestrian Comfort Level scale.*

5.13. It is noted that a lower PPMM value denotes a less crowded environment.

5.14. The proposed development would result in a slight increase in the average footway width compared to the existing situation without the bus stop (increase of 0.48m). The PCA shows that the average pedestrians per metre of clear footway width per minute (ppmm) will decrease from 3.57 to 2.86 and improve the pedestrian environment along the Gray's Inn Road frontage.

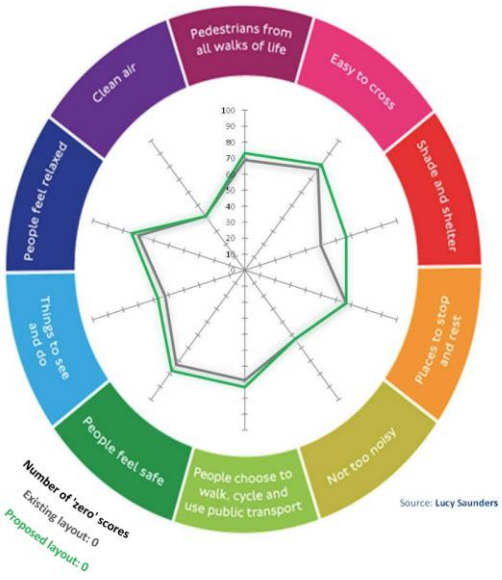
5.15. It is therefore considered that the proposed frontage along Gray's Inn Road would have a net positive impact on the pedestrian environment along Gray's Inn Road. The full pedestrian comfort assessment results are shown in Appendix D.

Healthy Streets Check for Designers

5.16. The Site's existing frontage and the proposed frontage along Gray's Inn Road have been assessed using the Healthy Streets Check for Designers toolkit.

5.17. The proposed frontage along Gray's Inn Road will provide benefits to the pedestrian environment (as well as wider benefits associated with the proposed development such as the provision of short stay cycle parking) which is evidenced within the Healthy Streets Check for Designers assessment. Figure 7 below shows the output.

Figure 7: Healthy Streets Check for Designers



Healthy Streets Indicators' scores (%)
(Results will only display once all metrics have been scored)

	Existing layout	Proposed layout
Pedestrians from all walks of life	69	73
Easy to cross	78	81
Shade and shelter	50	67
Places to stop and rest	67	67
Not too noisy	53	53
People choose to walk, cycle and use public transport	69	73
People feel safe	73	78
Things to see and do	52	57
People feel relaxed	70	74
Clean Air	42	42
Overall Healthy Streets Check score	68	72
Number of 'zero' scores	0	0
(Proposed layout score from applicable metrics)		13.79%

5.18. The Healthy Streets Check for Designers toolkit indicates that proposed development would increase the overall Healthy Streets score of the Site's Gray's Inn Road frontage from 68 to 72, which is a 13.79% increase from the existing layout.

5.19. The Healthy Streets Check for Designers toolkit output is included in Appendix E.

Proposed Parking Provision

Cycle Parking

5.20. It is proposed that the existing basement car park will be provided as a cycle store. A total of 400 long stay cycle parking spaces will be provided, which is in accordance with the London Plan cycle parking standards and the Camden cycle parking requirement of providing 20% additional cycle parking above the London Plan standards. The split of cycle parking type is outlined below:

- Accessible spaces: 5% or 20 cycle parking spaces will be accessible spaces on Sheffield stands suitable for larger/adapted cycles in-line with the London Plan 2021 requirements for larger/adapted cycles.
- Sheffield stands: 20% or 80 cycle parking spaces will be provided on standard Sheffield stands.
- Vertical racks: 75% or 300 cycle parking spaces will be provided as double stacker spaces.

5.21. All long stay cycle parking will be provided on the basement level. Access to the basement cycle store will be via the existing vehicle ramp, which employees can wheel their bikes up/down. The ramp is wide enough to accommodate cycle traffic as it is proposed to be repurposed from a vehicle ramp. An existing lift will provide access from the ground floor to the basement cycle store for larger/adapted cycles and cyclists who do not wish to wheel their bike up/down the existing vehicle ramp. Access to the lift will be via an entrance to the building located in the courtyard to the south of the Site.

5.22. A cycle repair station will be provided in the cycle store. The proposed development will also provide shower/changing facilities and lockers for cyclists.

5.23. A total of 33 showers and communal changing rooms will be provided. A total of 400 lockers will be provided.

5.24. A total of 17 short stay cycle parking spaces will be provided at ground level. Due to footway constraints along Gray's Inn Road and Brooke Street, it is proposed that short stay cycle parking will be provided within the courtyard space between the Site and development to the south and Brooke's Market Square area which is proposed to be improved with landscaping.

Car Parking

5.25. The proposed development will remove the existing basement car park which currently accommodates 26 parking spaces. A disabled parking bay will be provided at ground level in the courtyard area to the south of the Site between 150 Holborn and the Site.

5.26. It should be noted, Farringdon Station provides step-free access between platform and train (between 0-50mm) with access from platform to train by boarding ramp for some services. There is also step free access from nearby bus stops along Gray's Inn Road and High Holborn. Therefore, the Site is accessible by public transport for those with restricted mobility.

Delivery and Servicing

5.27. The proposed development will provide a dedicated on-site loading bay which can be accessed from Brooke Street. It is understood that existing deliveries and servicing takes place from Brooke Steet or the courtyard between Fox Court and the building to the south accessed via Brooke Street.

5.28. The proposed on-site loading bay can accommodate delivery and servicing vehicles up to a 7.5T Panel Van. A swept path of a 7.5T Panel Van and a 3.5T Van access and egress the loading bay is shown in Appendix F. Any deliveries or visits by servicing vehicles larger than 7.5T Panel Van will stop on-street along Brooke Street where double yellow lines prevent on-street parking, however it is anticipated deliveries or visits from servicing vehicles larger than a 7.5T Panel Van will be infrequent. Goods will be carried directly from the loading bay into the development.

5.29. A trip generation assessment of the delivery and servicing vehicles expected to visit the Site on a daily basis has been based on the TRICS sites selected in the trip generation assessment in Section 7 which have a 'servicing' trip rate.

5.30. The proposed development is expected to generate an increase of 17 deliveries or visits by servicing vehicle a day. This equates to just over an additional delivery or visit by servicing vehicle an hour, which is expected to be accommodated within the on-site loading bay which is proposed to be provided as part of the development. The majority of delivery and servicing vehicles will be ford transit or Luton type vans. Consolidation at the site will be considered to reduce the number of delivery and servicing trips to the site. Camden currently run a consolidation centre in partnership with Islington. It has previously been accepted by the City of London that consolidation can reduce the number of deliveries by 50% or more (planning reference: 19/01345/FULMAJ and 21/00272/FULMAJ).

Refuse Collection

5.31. A dedicated refuse store will be provided at ground level fronting Brooke Street. Refuse collection will take place on-street from Brook Street. Refuse collection will be undertaken by a private waste contractor. Further details of refuse collection will be provided within the Operational Waste Management Plan submitted alongside this TA.

Public Realm Improvements

5.32. There are a number of opportunities to improve the public realm in the surrounding area, delivering a wider benefit to site users and the surrounding area.

5.33. It is proposed to activate the Brooke's Market square area and improve the connectivity to the buildings entrance along Brooke Street. This will be achieved by:

- Freestanding raised planter proposed to increase ground level greenery to complement the existing mature tree canopies.
- Provide additional seating.
- Lighting improvement.
- Provision of short stay cycle parking

5.34. It is proposed to upgrade the Brooke's Court footpath. This will be achieved by:

- Enhance pedestrian experience for residents (of adjacent units) and visitors.
- Improve the current road surface.
- Opportunities to introduce furniture, (i.e. planters).
- Opportunities to activate the space with seatings, and seasonal plating.

6. Active Travel Zone Assessment

General

6.1. This Active Travel Zone (ATZ) assessment has been undertaken to consider how future employees will be able to make key journeys to and from the Site to support car-free lifestyles on a daily basis. It has been undertaken in accordance with TfL guidance and informed by site visits. The ATZ comprises an area around the Site that can be reached within 20 minutes by bicycle.

6.2. This ATZ assessment is a review of the key pedestrian and cycle routes to and from the Site to key destinations within the ATZ, measured against the 10 Healthy Streets indicators as displayed in Figure 8. The ATZ assessment was supported by a site visit, undertaken in April 2023, which included taking a series of photographs of the active travel network.

Figure 8: Healthy Streets Indicators

6.3. TfL identify key destinations as:

- Public transport stops;
- Public transport stations;
- London's current and future London-wide strategic cycle network;
- Town centres;
- Parks;
- Schools / colleges;
- Hospitals / doctors; and
- Places of worship.

ATZ Map 1

6.4. Map 1 (see Appendix G) illustrates all key active travel destinations within the ATZ. The scale of the ATZ (20-minute cycle ride around the site) has been determined using the WebCAT tool.

6.5. As illustrated by Map 1 there are many examples of each key destination within the ATZ. The nearest example of each key destination has therefore been assessed in detail on the basis these would be the most important key destinations for future employees of the Site, with public transport stops and stations along with the strategic cycle network also being important key destinations for future employees and visitors to the Site.

ATZ Map 2

6.6. Map 2 (see Appendix G) illustrates the revised ATZ at a neighbourhood scale incorporating:

- Most important key destinations;
- All accidents that resulted in fatalities (kills; K) or clusters of serious injury (seriously injured; SI).

6.7. Personal Injury Accident (PIA) data has been reviewed using TfL collision data for the three-year period to date to help inform the ATZ Assessment. The PIA data and study area are provided at Appendix D. There were no PIAs that resulted in fatalities (K) and no clusters of three or more SIs along the key routes identified.

6.8. Table 8 provides a summary of the key destinations for future users of the Site. The Site is located within easy reach of a wide range of facilities, which results in a relatively small area.

Table 8: Summary of Key ATZ Destinations

Key Destination Type	Key Destination	Justification
Public transport stops / stations	High Holborn Bus Stop (Stop C)	Closest bus stop to the site providing access to bus routes 17 and 47.
	Chancery Lane station Bus Stop (Stop E)	Second closest bus stop providing access to bus routes 8, 59, 133 and N242.
	Chancery Lane Underground Station	Closest underground station to the site providing access to Central line services.
	Farringdon Train Station	Second closest station to the site providing access to Elizabeth line, Thameslink, Circle, Hammersmith & City and Metropolitan line services.
Parks	Gray's Inn Gardens	Closest Park/garden to the site.
Strategic cycle network	Cycleways 6 & 41	Closest cycleways to the site
Market / food store	Leather Lane Market	Nearby food market.
	M&S Simply Food	Nearby food store
	Tesco Express	Nearby food store

6.9. Table 9 provides a summary of the key routes most likely to be travelled to access the key destinations, as shown in Map 3 (see Appendix G).

Table 9: Summary of Key Routes and Destinations from Development Site

Route	Links to Destination
Route 1: Site to Gray's Inn Gardens	High Holborn Bus Stop (Stop C)
Route 2: Site to Chancery Lane station Bus Stop	Chancery Lane Underground Station Tesco food store, M&S Simply Food
Route 3: Site to Farringdon Train Station	Leather Lane Market

6.10. A good proportion of trips to and from the Site are expected to be via High Holborn bus stop, Chancery Lane station bus stop, Chancery Lane underground station and Farringdon underground/train station making them important public transport destinations. The site is also well located within the TfL cycle network and can be accessed conveniently and safely by cycle from all parts of London.

ATZ Neighbourhood Review

6.11. Waterman undertook a site visit on 18 April 2023 between the hours of 11:00-15:00 where each of the key routes identified in Table 9 were audited. Point of View (POV) photographs were taken circa every 150 metres as a snapshot of the route.

6.12. As detailed in the guidance, the worst section of each route has been identified and assessed against the Healthy Streets indicators. A high-level summary of the ATZ Neighbourhood Review is provided below, and the full details of the review are included in Appendix H**.**

6.13. The Active Travel Zone neighbourhood review has identified the following worst sections of each of the 3 active travel routes:

- Route 1 – Site to Gray's Inn Gardens – Worst part of the route Gray's Inn Road Adjacent to Footway (due to temporary works);
- Route 2 – Site to Chancery Lane station Bus Stop – Worst part of the route Gray's Inn Road – Opposite the Site; and
- Route 3 – Site to Farringdon Train Station – Worst part of the route Brooke Street Adjacent to footway.

6.14. The worst section of each of the above routes do not meet the healthy streets indicators. The worst section of routes 1, 2 and 3 are associated with the existing deficiencies, temporary works and maintenance issues at these locations, with the pedestrian and cycle environmental along other sections of the routes considered high quality which will encourage walking and cycling as a main mode of transport.

6.15. The worst sections of each route can be improved through the completion of temporary works which will provide an improved pedestrian environment and more frequent emptying/cleaning of bins to stop overspill of rubbish. It should be noted, the proposed landscape improvements to Brooke's Market square area and the Brooke's Court footpath will improve the pedestrian environment along the routes assessed.

Committed developments

6.16. The Site is located within Central London where there is a large amount of forthcoming development. In addition, the Site is located within LBC's Cumulative Impact Area. This Central London area in LBC represents just under a quarter of the total planned development activity in the borough despite only representing 13% of the geographical area.

6.17. Forthcoming development within the surrounding area and in Central London will be policy compliant and be car free and provide cycle parking in-line or in excess of the London Plan 2021 standards, and where possible provide benefits to the surrounding pedestrian and cycle environment. Any nearby committed development is therefore likely to have a positive impact on future users of the proposed development.

6.18. The committed development which will have the greatest impact on the Site is the recently completed development 150 Holborn site bordering the site to the south, which is already partly occupied. A description of the approved and partially occupied development at 150 Holborn to the south of the site is below:

”Demolition of existing building and redevelopment for a mixed use development up to 9 storeys in height comprising 14,604 sqm GEA office floorspace (Use Class B1), 1,450 sqm GEA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works”

6.19. The 150 Holborn development will be car free, provide policy compliant cycle parking and has provided active frontages along the footway on Gray’s Inn Road, giving pedestrians things to see and do and will also provide shade and shelter with the overhang when walking past the site.

6.20. The partially occupied site to the south is therefore considered to have a positive impact on the pedestrian and cycle environment in the surrounding area and would not impact on the proposed development.

7. Trip Generation

General

7.1. This section considers the likely multi-modal trips that the existing and proposed development would be expected to generate and considers the impact of the proposals upon the surrounding highway and transport networks.

7.2. The existing office building is currently occupied by Citibase on ground and first floors and HM Courts & Tribunals Services on the fourth and fifth floors. The remaining floors (second, third, sixth and seventh) are currently vacant and have a permitted use as office. The existing site has a floor area of circa 15,319sqm GEA. This assessment considers the existing situation as fully occupied.

7.3. The proposals seek to increase the existing floor area by circa 9,652sqm (GEA) to provide a 24,971sqm (GEA) of office space. The TRICS database has been used to derive the anticipated total person trip rates associated with both the existing and proposed office space. A full copy of the TRICS output is contained within Appendix I.

Trip Generation

Trip Rates

7.4. To ensure sites selected are comparable to the existing and proposed office use the following selection parameters have been applied:

- Land Use: Employment;
- Category: Office; and
- Location: Edge of Town Centre and Town Centre.
- Accessibility: PTAL 6B

7.5. The total person trip rates obtained from the TRICS assessment are set out in Table 10.

Table 10: Office Use Total Person Trip Rates (per 100sqm)

Period	Office - Total Person Trip Rates (per 100sqm)		
	Arrivals	Departures	Two-way
AM Peak (08:00 - 09:00)	2.537	0.25	2.787
PM Peak (17:00 - 18:00)	0.165	2.356	2.521
Daily (07:00 - 19:00)	9.781	9.688	19.469

Existing Trip Generation

7.6. The total person trip generation has been calculated using the trip rates presented in Table 10.

7.7. The total person trip generation for the existing office use (comprising 15,319sqm GEA) is presented in Table 11.

Table 11: Existing Office Use – Total Person Trip Generation (15,319sqm)

Period	Total Person Trip Rates (per 100 sqm)			Total Person Trips		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
AM Peak	2.537	0.25	2.787	389	38	427
PM Peak	0.165	2.356	2.521	25	361	386
Daily	9.781	9.688	19.469	1,498	1,484	2,982

7.8. As indicated in Table 11, the existing office use would generate 427 two-way person trips during the morning peak hour, 386 two-way person trips during the evening peak hour and a total of 2982 two-way person trips throughout the day.

Multi-Modal Trips

7.9. To understand the multi-modal trip generation associated with the existing office space, the total person trips calculated in Table 11 have been applied to the workplace modal shares for journeys to work for the local area as set out in Table 5.

7.10. The resulting multi-modal trip generation is presented in Table 12 below.

Table 12: Multi-Modal Trip Generation – Existing Office Use

Mode	Mode Split	08:00-09:00	17:00-18:00	Daily
Underground	37%	158	143	1,103
Train	34%	145	131	1,014
Bus etc.	12%	51	47	358
Taxi	0%	0	0	0
Motorcycle etc.	1%	4	4	30
Car Driver	5%	22	19	149
Car Passenger	0%	0	0	0
Bicycle	6%	26	23	179
On foot	5%	21	19	149
Other	0%	0	0	0
Total	**100%**	**427**	**386**	**2,982**

Proposed Trip Generation

7.11. Based on the trip rates presented in Table 10 above, the total person trip generation for the proposed office use (comprising 24,971sqm GIA) is provided in Table 13.

Table 13: Proposed Office Use – Total Person Trip Generation (24,971sqm)

Period	Total Person Trip Rates (per 100 sqm)			Total Person Trips		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
AM Peak	2.537	0.25	2.787	634	62	696
PM Peak	0.165	2.356	2.521	41	588	629
Daily	9.781	9.688	19.469	2,442	2,419	4,861

7.12. As indicated in Table 13, the proposed office use would generate 696 two-way person trips during the morning peak hour, 629 two-way person trips during the evening peak hour and a total of 4861 two-way person trips throughout the day.

Multi-Modal Trips

7.13. The total person trips for the proposed office space calculated in Table 12 has been applied to the workplace modal shares for journeys to work for the local area as set out in Table 5.

7.14. The proposed development will remove the existing 26 space basement car park and therefore the modal splits have been adjusted to reflect the car-free nature of the development. The car mode share has been redistributed in direct proportion to the other modes.

7.15. The adjusted mode split and resulting trip generation is presented in Table 14 for the proposed office use.

Table 14: Multi-Modal Trip Generation – Proposed Office Use

Mode	Baseline Split	Adjusted Split	08:00-09:00	17:00-18:00	Daily
Underground	37%	39%	271	245	1,896
Train	34%	36%	250	227	1,750
Bus etc.	12%	12%	84	76	583
Taxi	0%	1%	7	6	49
Motorcycle etc.	1%	1%	7	6	49
Car Driver	5%	0%	0	0	0
Car Passenger	0%	0%	0	0	0
Bicycle	6%	6%	42	38	291
On foot	5%	5%	35	31	243
Other	0%	0%	0	0	0
Total	**100%**	**100%**	**696**	**629**	**4,861**

Net Change

7.16. Table 15 below presents the expected net increase of total person trips arising from the proposed extension and refurbishment of the Site.

Table 15: Net Change

Period	Net Change in Total Person Trips		
	Arrivals	Departures	Two-Way
AM Peak	+ 245	+ 24	+ 269
PM Peak	+ 16	+ 227	+ 243
Daily	+ 944	+ 935	+ 1,879

7.17. The table above suggests that the proposed development could result in an increase of 260 two-way total person trips in the AM peak, 235 total person trips in the PM peak and up to 1,818 two-way total person trips across the duration of the day.

7.18. The net change across the different modes of travel is presented in Table 16 below.

Table 16: Net Change in Trips by Mode

Mode	08:00-09:00	17:00-18:00	Daily
Underground	+ 113	+ 102	+ 793
Train	+ 105	+ 96	+ 736
Bus etc.	+ 33	+ 29	+ 225
Taxi	+ 7	+ 6	+ 49
Motorcycle etc.	+ 3	+ 2	+ 19
Car Driver	- 22	- 19	- 149
Car Passenger	0	0	0
Bicycle	+ 16	+ 15	+ 112
On foot	+ 14	+ 12	+ 94
Other	0	0	0
Total	**+ 269**	**+ 243**	**+ 1,879**

7.19. As shown in the net change comparison, the majority of trips will be distributed onto the surrounding public transport network. Given the excellent PTAL of the Site, it is considered that the existing public transport infrastructure will be able to accommodate the likely uplift from the proposed development.

Trip Generation Summary

7.20. Trip generation for the Site has been calculated based on the industry standard software, the TRICS database (v.7.10.2).

7.21. The results of the TRICS assessment suggests that the Proposed Development could result in an uplift of 269 two-way total person trips in the AM peak, an uplift of 243 two-way total person trips in the PM peak and an uplift of 1,879 two-way total person trips across the duration of a day.

7.22. The Proposed Development will remove the existing 26 space basement car park therefore there will be a reduction in vehicle trips of 22 in the AM Peak, 19 in the PM Peak and 149 across the duration of a day.

7.23. It is expected the majority of the increased trips will be made using underground, train, bus and by walking and cycling. The Site is considered to have an excellent accessibility to public transport (PTAL rating of 6b) and is well located within the surrounding cycle and pedestrian network.

7.24. The surrounding transport network is therefore considered as suitable to accommodate the uplift in person trips from the proposed development.

Impact Assessment

7.25. This sub-section considers the potential impact of the proposed development for each mode of transport.

Walking and Cycling Impact

7.26. The forecast increase in the number of peak hour walking and cycle trips associated with the proposed development are shown in Table 17.

Table 17: Uplift in Walking and Cycling Trips

Net Increase	AM Peak	PM Peak	Daily
Walk	+ 14	+ 12	+ 94
Cycle	+ 16	+ 15	+ 112

7.27. The Proposed Development will generate an additional 14 and 12 walking trips in the AM and PM peaks and 94 walking trips throughout the day. Continuous footways are provided along Gray's Inn Road and Brooke Street. Several crossing points are available along Gray's Inn Road including a zebra crossing to the north of the junction with Baldwin's Garden and a controlled crossing at the junction with A40 Holborn.

7.28. The proposals will extend the Site's façade along Gray's Inn Road for floors one and above. Columns will be introduced within the Site boundary, to support the extended façade. The existing ramp and steps providing access to the site will be removed.

7.29. A Pedestrian Comfort Assessment (PCA) was undertaken for the previous, existing and proposed site frontage and the results are presented in Table 7. The PCA demonstrated that the average pedestrians per metre of clear footway width per minute (ppmm) will decrease from 3.57 to 2.86 and therefore the proposed frontage along Gray's Inn Road would have a net positive impact on the pedestrian environment along Gray's Inn Road.

7.30. The proposals will also support improvements the public realm in the surrounding area, delivering a wider benefit to site users and the surrounding area. It is proposed to activate the Brooke's Market square area and improve the connectivity to the buildings entrance along Brooke Street. It is also proposed to upgrade the Brooke's Court footpath.

7.31. The Proposed Development is therefore considered to have a net benefit on the surrounding walking environment and the uplift in walking trips can be accommodated within the pedestrian network.

7.32. The Proposed Development will generate an additional 16 and 15 cycling trips in the AM and PM peaks, and 112 cycling trips throughout the day. The proposals will provide cycle parking in-line with London Plan 2021 and LBC cycle parking standards and therefore will be able to accommodate the cycle demand arising at the site.

7.33. The site is also well located within the local cycle network. Cycleway 6 (C6) and Cycleway 41 (C41) run to the east and west of the Site respectively. C6 runs along Farringdon Street and provides a cycle route from Camden to Elephant and Castle with large sections of segregation. C6 also connects with C3 which runs along the River Thames between Blackfriars Bridge and Houses of Parliament and connects to Cycle Superhighway 7. C41 provides a link between Holborn and C6 and C27 to the northwest of the Site. There are also 3 cycle hire docking stations within the vicinity of the site. The proposed development will therefore have a negligible on the surrounding cycle network.

Public Transport Impacts

7.34. Table 18 presents the forecast increase in public transport trips associated with the proposed development.

Table 18: Uplift in Public Transport Trips

Net Increase	AM Peak	PM Peak	Daily
Underground	+ 113	+ 102	+ 793
Train	+ 105	+ 96	+ 736
Bus	+ 33	+ 29	+ 225

Underground Impact

7.35. The Proposed Development could generate up to an additional 113 two-way underground trips in the AM peak, 102 two-way underground trips in the PM peak and up to 793 two-way underground trips across the duration of the day.

7.36. The Site has a PTAL rating of 6b which indicates an excellent accessibility to public transport. The Site is located within easy walking distance of two underground stations:

- Chancery Lane Underground Station (120m walk) – provides access to Central Line services. There are circa 55 Central Line services accessible from Chancery Lane in peak hours.
- Farringdon Train Station (600m walk) - provides access to Circle, Hammersmith & City and Metropolitan Underground services and Elizabeth Line services. There are circa 98 Underground/Elizabeth line services during the peak hours.

7.37. There are circa 153 Underground and Elizabeth line services available from Chancery Lane and Farringdon Station in the AM and PM Peak. This would relate to an increase of less than one underground trip per service from Chancery Lane and Farringdon Station. The proposed development is therefore expected to have a negligible impact on the surrounding underground network.

Rail Impact

7.38. The Proposed Development could generate up to an additional 105 two-way rail trips in the AM Peak and 96 two-way rail trips in the PM Peak and up to 736 rail trips across the duration of the day.

7.39. There are circa 39 Thameslink Rail services accessible from Farringdon Station in the peak hours. It is expected that staff commuting by rail would also arrive at arrive other train stations in central London (London Euston and Kings Cross Pancras are circa 20-30 minute walk from the Site) and then walk or cycle to the site. It is therefore expected that the Proposed Development would have a negligible impact on the rail network.

Bus Impact

7.40. The Proposed Development could generate up to an additional 33 two-way bus trips in the AM peak, 29 two-way bus trips in the PM peak and up to 225 two-way bus trips across the duration of the day.

7.41. The closest bus stops to the site are located along Gray's Inn Road and Holborn and are within 200m walk of the site. These bus stops provide access to frequent bus services with circa 58-92 bus services an hour. This would equate to less than one additional passenger per bus service.

7.42. The impact of the additional bus trips is therefore considered to be negligible.

Highway Network Impacts

7.43. The Proposed Development will remove the existing 26 space basement car park and result in a reduction of vehicle trips of 22 in the AM Peak, 19 in the PM peak and 149 throughout a day. The proposed development is therefore expected to have a positive impact on the surrounding highway network.

7.44. The Proposed Development is expected to generate an increase of 17 deliveries or visits by servicing vehicle a day. Delivery and servicing vehicles for the existing site currently stop on-street. The proposals will provide a dedicated loading bay for deliveries and servicing. The majority of delivery and servicing vehicles will be ford transit or Luton type vans.

Management Plans

Framework Travel Plan

7.45. A Framework Travel Plan (FTP) has been prepared alongside this TA. The FTP sets out a strategy for encouraging travel using sustainable and active modes of travel and outlines a monitoring regime for staff travelling to the site.

Delivery & Servicing Plan

7.46. A Delivery and Servicing Management Plan (DSP) has been prepared alongside this TA. The DSP sets out the delivery and servicing strategy for the proposed development and how deliveries and servicing can be undertaken in a safe, efficient manner, reducing the impact of delivery and servicing on the surrounding highway network.

Outline Construction Management Plan

7.47. An Outline Construction Management Plan (OCMP) has been developed using LBC Pro-forma. A detailed Construction Management Plan will be secured by S106 and will be prepared by the principal contractor.

8. Summary & Conclusion

Overview

8.1. Waterman Infrastructure & Environment Ltd ('Waterman') has been appointed by Clare Real Estate (14 Gray's Inn Road) Limited (the 'Applicant') to prepare a Transport Assessment (TA) in support of an application for the proposed refurbishment and extension at Fox Court, London, WC1X 8HN (the 'Site'). The proposals seek to increase the existing floor area by 9,832sqm (GEA).

8.2. The existing site is occupied by a nine-story building providing circa 15,319sqm GEA floor area of office space. The office is partially occupied with Citibase on ground and first floors and HM Courts & Tribunals Services occupying the fourth and fifth floors. The remaining floors (second, third, sixth and seventh) are currently vacant. There is currently a basement car park with 26 parking spaces.

8.3. The development proposals are for the refurbishment and extension of the existing office building to provide a total of 24,971sqm office floor area (GEA). The proposals will increase the existing floor area by 9,832sqm GEA. The existing car park will be removed and repurposed for cycle parking and other ancillary features.

Key Transport Elements

8.4. A review of the relevant current policy and guidance material has been undertaken to demonstrate that the proposals have been designed to comply with the principles and requirements set out within the London Plan (2021), Camden Local Plan (2017) as well as other relevant local, regional and national planning policy.

8.5. The Site falls within an area of PTAL 6b, meaning it has an 'excellent' level of accessibility to public transport. The site is well located within the local cycle network, and there are 3 Santander Cycle Hire Stations 400m of the site.

8.6. The proposed development will remove the existing 26 space car park and will provide cycle parking in-line with London Plan 2021 and Camden guidance. 5% of the total cycle parking provision will be provided for lager and accessible cycles, with the remaining spaces being provided as a mixture of Sheffield stands and vertical racks. A secure and covered cycle store will be provided on the basement level. Access to the cycle store will be via the existing vehicle ramp to the basement and an existing lift for larger and accessible cycles. Shower, changing and locker facilities will also be provided. A dedicated loading bay will be provided on-site which will be accessible from Brooke Street.

8.7. As part of the proposed development, the proposals will extend the Site's façade along Gray's Inn Road for floors one and above. Columns will be introduced within the Site's boundary, to support the extended façade. The existing ramp and steps providing access to the site will be removed. A PCA has been undertaken of the previous, existing and proposed site frontage. The PCA indicate that the proposed frontage along Gray's Inn Road would have a net positive impact on the pedestrian environment along Gray's Inn Road. The Healthy Streets Check for Designers toolkit indicates that proposed development would increase the overall Healthy Streets score of the Site's Gray's Inn Road frontage.

8.8. An Active Travel Zone assessment has been undertaken which audited the walking and cycling routes to key destinations from the site. The routes audited were to Gray's Inn Gardens, Chancery Lane station Bus Stop (and Chancery Lane Station) and Farringdon Train Station. The pedestrian and cycle environment along these routes were considered to be high quality, however the worst sections of the routes assessed are associated with the existing deficiencies of the local streets surrounding the Site, temporary works and the cleanliness/maintenance of footways.

8.9. A multi-modal trip generation assessment of the existing and proposed Site has been undertaken. The results of the TRICS assessment suggests that the proposed development could result in an uplift of 266 two-way total person trips in the AM peak, an uplift of 243 two-way total person trips in the PM peak and an uplift of 1,879 two-way total person trips across the duration of a day. The proposed development will remove the existing 26 space basement car park and result in a reduction of vehicle trips of 22 in the AM Peak, 19 in the PM peak and 149 throughout a day. The proposed development is therefore expected to have a positive impact on the surrounding highway network. Give the Sites excellent accessibility to public transport (PTAL 6B), the increase in walking, cycling and public transport trips are expected to have a negligible impact on the surrounding highway network.

Conclusion

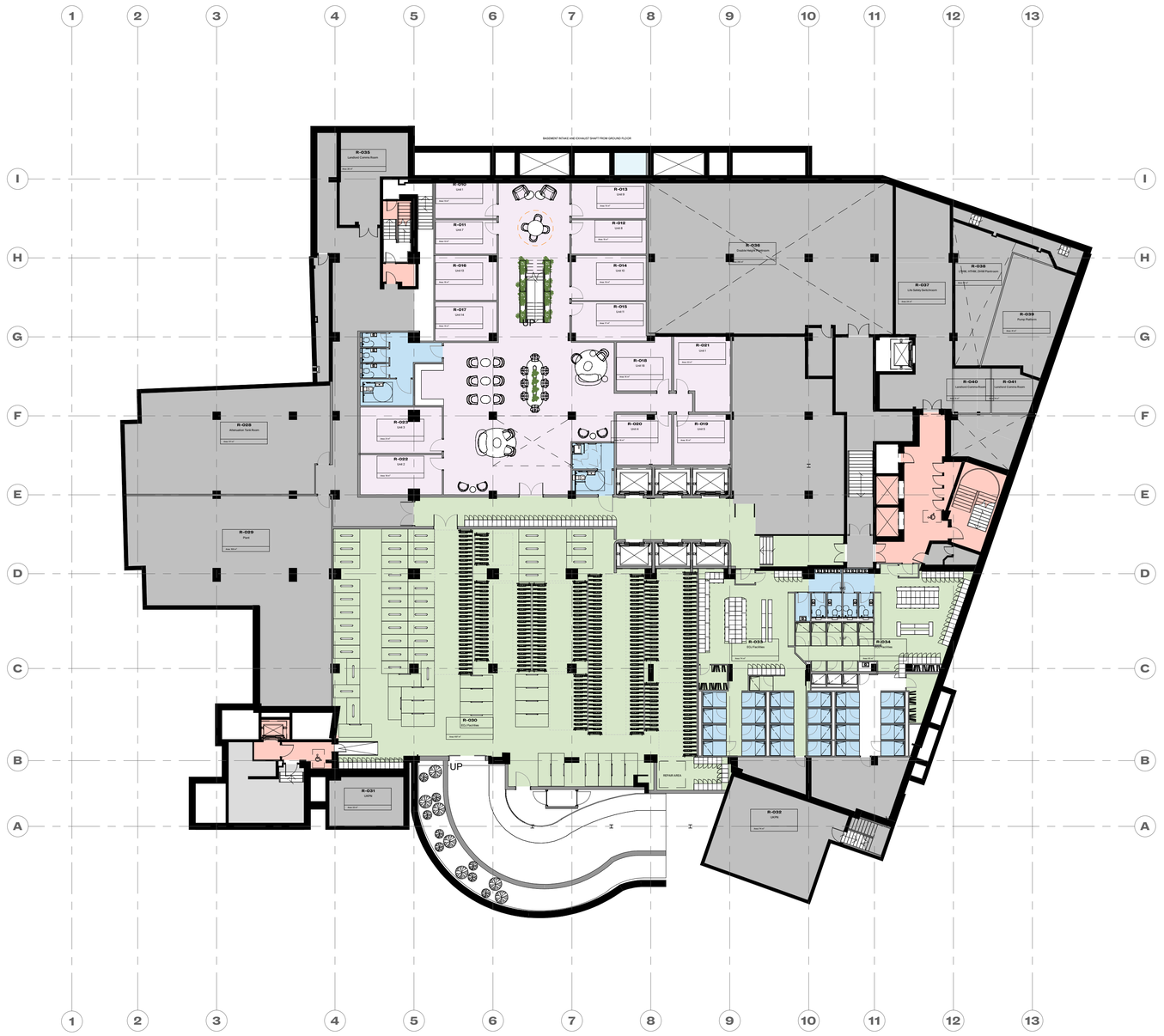
8.10. This TA has demonstrated that the proposed development is in accordance with the prevailing policy requirements and is considered to be acceptable in transport terms. On that basis and in transport terms, the proposed development should be recommended for approval.

APPENDICES

A. Site Layout Plans

By Department Legend

- Afforable WorkSpace
- Core-Fire
- Office
- Risers
- Core-Other
- EOJ Facilities - Changing Room
- EOJ Facilities - corridor
- EOJ Facilities - lobby
- EOJ Facilities
- WC's
- Plant



0 1 2 5m

N

GENERAL NOTES:

1. These drawings are for costing and information only and are **NOT** to be used for tender or construction.

2. These architectural drawings have been based off Point2 Surveyors pre-strip out 2D survey drawings issued on November 2022 and therefore, may not include various areas not fully surveyed or building anomalies which could alter the scope and information of these drawings.

REV	DATE	NOTE
A	31.10.23	Issue for Planning

CLIENT: **Clare Real Estate Ltd**

PROJECT: **Fox Court**

DWG No.: **1195-BGY-XXX-099B-DR-A-04299** REVISION: **A**

DRAWING: **Planning - Proposed Plan - Level -01**

STATUS: **PLANNING** APPROVED BY: **TB** SUITABILITY: **S4**

SCALE: **1 : 200 @A1** DATE: **31.10.23**

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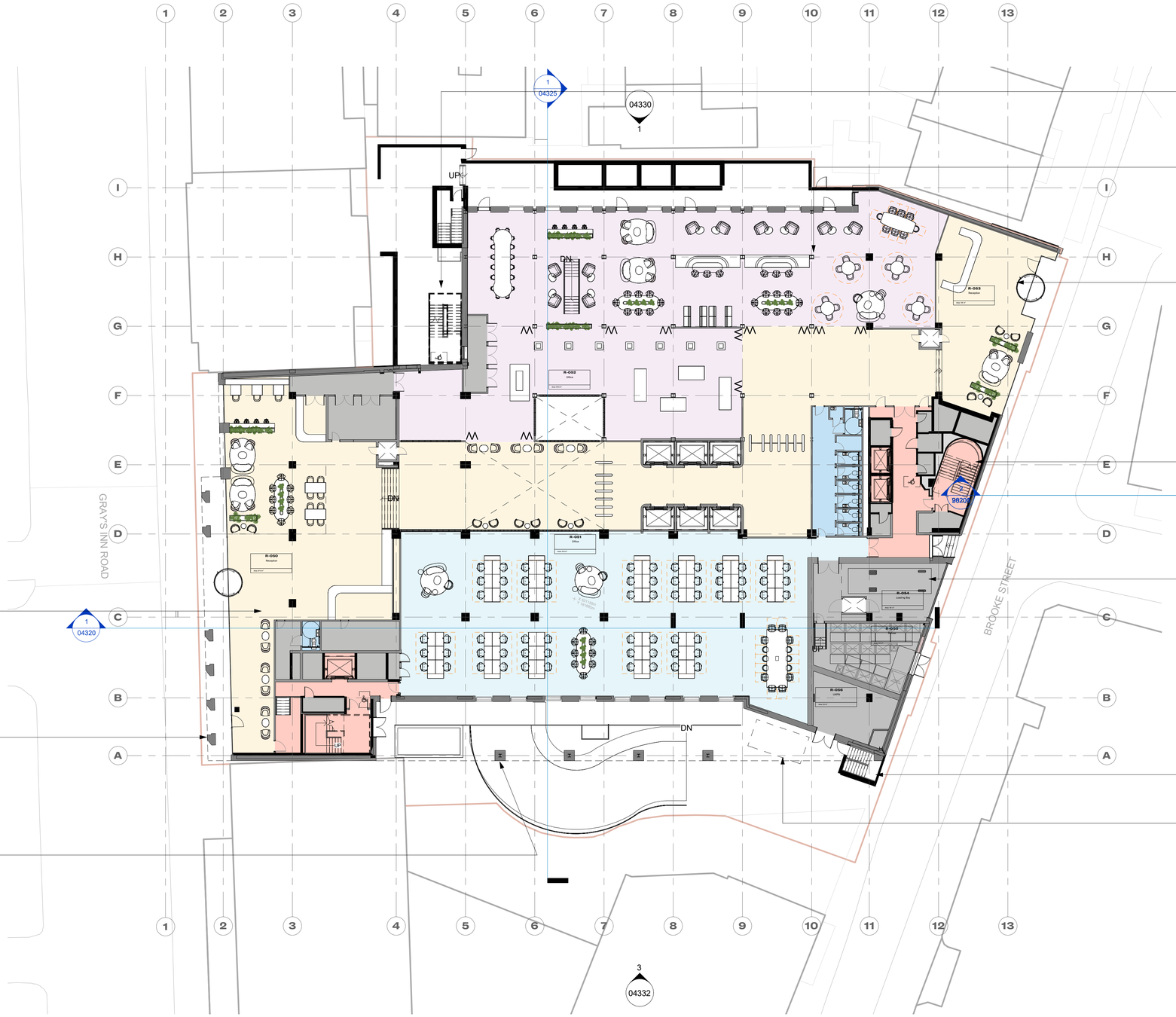
By Department Legend

- Afforable WorkSpace
- Core-Fire
- Office
- Risers
- Core-Other
- WC's
- Plant
- Reception



04233 1

12. New light weight metal fire escape stair

13. Hybrid steel and CLT extension in existing courtyard

14. New reception entrance on Brookes Street

15. Existing core to be upgraded to fire fighting core

16. Relocated loading bay entrace

17. New substation with entrance onto courtyard

18. 1 m. disabled parking space shown in dashed

21. Reception slab lowered to be at grade to Gray's Inn Road

20. New brick clad columns forming colonnade supporting new elevation above

19. New columns to support extension above

0 1 2 5m

N

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REV	DATE	NOTE
A	31.10.23	Issue for Planning

CLIENT: **Clare Real Estate Ltd**

PROJECT: **Fox Court**

DWG No.: **1195-BGY-XXX-100L-DR-A-04300** REVISION: **A**

DRAWING: **Planning - Proposed Plan - Level 00**

STATUS: **PLANNING** APPROVED BY: **TB** SUITABILITY: **S4**

SCALE: **1 : 200 @A1** DATE: **31.10.23**

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