

**From:** Leong Chris [REDACTED]  
**Sent:** 14 December 2018 11:20  
**To:** McClue, Jonathan [REDACTED]  
**Cc:** Planning [REDACTED]  
**Subject:** TfL Comments - 2018/5715/P Eastman Dental Hospital Site and Buildings, located at 256 Gray's Inn Road WC1X 8LD

Dear Jonathan,

**TfL Spatial Planning Reference:** 18/4458

**Borough Reference:** 2018/5715/P

**Location:** Eastman Dental Hospital Site and Buildings (including the former Royal Free Hospital, the Eastman Dental Clinic, and the Levy Wing), located at 256 Gray's Inn Road WC1X 8LD

**Proposal:** Request for scoping opinion under Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving the substantial demolition of the Former Royal Free Hospital (with retention of the Alexandra Wing) and Levy Wing buildings and new buildings of up to five and nine storeys (with two basement floors below) to provide the University College London (UCL) Institute of Neurology/Dementia Research Institute within approximately 17,450sqm of medical research floorspace, a related neurological outpatient facility for University College London Hospitals NHS Trust and approximately 13,160sqm of academic floorspace for UCL, along with associated basement; landscaping; highways works; accessible parking bays; public realm; cycle spaces; plant; large vehicle access and servicing.

Thank you for consulting TfL with regard to the above planning application. TfL has the following comments:

The site for proposed development is on A5200 Gray's Inn Road, which forms part of the Strategic Road Network (SRN). Whilst the Local Authority is the highway authority for those roads, TfL has a duty under the Traffic Management Act 2004 to ensure that any proposal does not have an adverse impact on the SRN.

#### Healthy Streets

TfL has launched the Healthy Streets Approach, which aims to reduce vehicle dominance, improve air quality, increase walking and cycling, and make attractive places to live, work and do business. TfL expects this development to deliver improvements that support the ten Healthy Streets Indicators in line with Policy T2 of the draft London Plan.

The development should support the Mayor's aims (MTS, p.23) for all Londoners to do 20 minutes of active travel each day and (p.305) for at least 80% of trips across London to be made by active, efficient, and sustainable modes, i.e. walking, cycling and public transport by 2041.

The Pedestrian Environmental Review System (PERS) assessment proposed is welcome, but TfL is now promoting other approaches and tools. The local pedestrian environment should be assessed using the latest guidance at the TfL website. We are updating our guidance for planning applicants and new online content is currently expected by January 2019.

The pedestrian survey periods proposed are acceptable in principle. We would suggest that the results are used to calculate the Pedestrian Comfort Levels (PCL) for local footways rather than doing a PERS assessment.

The statements at paragraph 151 that the application will consider 'adequate' cycling and walking provision and access are unacceptable. Policy T2 (Healthy Streets) of the draft new London Plan clearly requires new development to reduce car dominance and improve walking and cycling conditions.

The Outline Scope of Assessment is acceptable in principle and the approach outlined in paragraph 161, for the TA and CLP to be a chapter in the EIA, seems sensible.

#### Cycle parking

Cycle parking provision must meet the minimum standards set out in Policy T5 (Cycling) of draft London Plan. 5% of cycle spaces should be able to accommodate larger bikes and be easily usable by mobility-impaired cyclists. Access to the cycle parking should be step-free and designed in accordance with the London Cycling Design Standards (LCDS).

#### Car parking

Given the location within a highly accessible area of central London, the development should be car-free (except disabled persons parking) in accordance with draft London Plan Policy T6 (Car parking). Operational car parking for the proposed facilities will only be accepted if proven to be based on essential operational need.

Disabled persons parking should be provided in accordance with draft London Plan Policy T6.5 (Non-residential disabled persons parking). At least one designated blue badge parking space should be provided even if no general parking is provided. Infrastructure provision should be made for electric or other Ultra-Low Emission vehicles.

#### Trip generation

A robust assessment of trip generation should be carried out based on an appropriate selection of sites. Depending on the outcome of any detailed trip assessment, TfL may seek mitigation for impact on the public transport network. Further information can be found on our website: <https://tfl.gov.uk/info-for/urban-planning-and-construction/>

#### Planning obligations

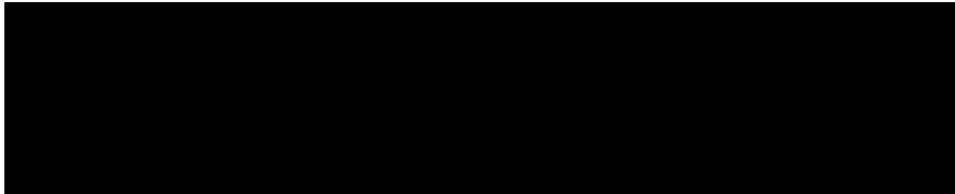
In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1st April 2012. All new developments that create 100m<sup>2</sup> or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in the London Borough of Camden. The required CIL should be confirmed by the applicant and the Council once the components of the development have been finalised.

The site is within The Central London charging area where Section 106 (S106) contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Crossrail funding' (March 2016). In these situations, the Mayoral CIL charge (not the Borough's) will be treated as a credit towards the S106 liability, only the larger of the two amounts will normally be sought

In June 2017, the Mayor published proposals for an MCIL2 to contribute to Crossrail 2 funding which would be levied from April 2019. The applicant should ensure that they are fully aware of the regulations.

Kind regards,

**Chris Leong** | Assistant Planner  
Spatial Planning (North) | City Planning | Transport for London



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