



Our Reference: CMDN/19/255
Borough Reference: 2019/2879/P

Transport for London
City Planning

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To Jonathan,

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RE: 256 Gray's Inn Road, Eastmans Dental Hospital

Thank you for consulting TfL on this referable planning application. TfL notes from the documents submitted that the proposal is:

“Partial redevelopment of the site, including to the Former Royal Free Hospital (Plot 1); Eastman Dental Clinic (Plot 2); Levy Wing (Plot 3); Frances Gardner House and the Riddell Memorial Fountain within the courtyard of the Former Royal Free Hospital, to create approximately 23,861sqm of medical research, outpatient facility and academic (Use Class D1) floorspace. Former Royal Free Hospital: demolition of the New, Sussex and Victoria Wings (with retention of the Alexandra Wing); single storey extension and reinstatement of southern pediment on Alexandra Wing; erection of five storey building (plus two storeys of plant and two storeys of basement) to the rear of the Alexandra Wing, including plant, terraces and flues, to provide a dementia and neurology research facility (Use Class D1). Eastman Dental Clinic: alterations to the listed building including the part rebuilding of the northern façade; replacement windows; new plant; works to the courtyard and associated external and internal alterations associated with its conversion to education use (Use Class D1). Levy Wing: substantial demolition of the building and erection of a part 4, part 7 storey building (plus single storey basement, including plant and external amenity spaces, to provide education space (Use Class D1). Frances Gardner House: installation of photovoltaic panels on the roof and landscaping works to the courtyard. Riddell Memorial Fountain: relocation of the listed fountain from the courtyard of the Former Royal Free Hospital to the courtyard of the Eastman Dental Clinic. Associated landscaping arrangements including the creation of a new public square, other public spaces and routes, and pedestrian connections to Gray's Inn Road, St Andrew's Gardens, Cubitt Street and Langton Close. Associated transport and servicing arrangements including cycle parking, parking and a new servicing ramp”

Please note that the following comments represent the views of TfL officers and are made on a “without prejudice” basis. They should not be taken to represent

an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments support the Stage 1 comments issued by the GLA.

Site Location

The site is located on the east side of Gray's Inn Road, which forms part of the Strategic Road Network (SRN). It is also bounded by the Calthorpe Project Garden to the north, Langton Close to the east, St. Andrew's Gardens to the south. Approximately 100m further to the east, Farringdon Road forms part of the Transport for London Road Network (TLRN).

The nearest London Underground (LU) station is King's Cross, located approximately 750m to the north-west of the site. This station is served by the Circle, Hammersmith and City, Metropolitan, Northern, Piccadilly and Victoria lines. London King's Cross also provides access to Great North and LNER national rail services. Located to the west of King's Cross is St Pancras International, which provides access to Eurostar, Southeastern, East Midlands and Thameslink rail services. Russell Square is also located approximately 860m to the south west and provides access to Piccadilly line services..

There is a pair of bus stops on Gray's Inn Road adjacent to the current hospital entrance which is served by routes 17 and 46. There are further stops within 640 metres of the site, providing access to routes: 259 and 63.

Due to the aforementioned public transport connections, the majority of the site has a Public Transport Access Level (PTAL) of 6a to 6b (on a scale of 0 to 6b, where 6b is the highest).

170m to the north, and 180 metres to the south of the site are cycle hire docking stations. Ampton Street, Clerkenwell, which is located to the north, has a capacity of 21. Wren Street, Holborn has a capacity of 33. Ampton Street/Sidmouth Street, located 165 metres to the north of the site, form part of Cycle Superhighway 6, which provides a strategic cycling route between King's Cross and Elephant and Castle. We also understand that Camden Council has proposed to introduce a protected cycle lane along this section of Gray's Inn Road.

Trip Generation and Modal Split

Mode Splits

Separate mode shares have been used for staff, students and patient populations.

Census data has been used to determine the existing modal split for patients, staff and students. TfL does not consider the use of census data to be the correct approach for determining the existing mode share, especially for patients for whom there will be a far wider catchment area than captured in the

local output area census data. TfL requests that surveys to capture the existing use mode are undertaken for a more robust assessment. Use of local data to determine patient mode split does not take into account the national-wide catchment and specialist function.

Patients

Future patient mode share has been derived from a combination of Census and TRICS data. As with existing trips, TfL is concerned that Census data will not properly capture travel patterns, especially given the proposal for a world leading research centre. The use of TRICS survey data from a GP surgery in Wandsworth is not comparable and therefore considered inappropriate. TfL recommends that a combination of survey data from the existing hospital on-site and other 'destination' medical facilities in London is used.

Furthermore, no quantitative evidence has been provided for the mode share for car/taxi/patient transport being modified to 10%, TfL requests that this is supplied.

Staff

The future staff mode share has been derived from Census WP703EW-Method of Travel to Work (workplace) data. It is not considered that this is the correct approach for determining the future mode share of staff, with Census data being less relevant as time goes by. Again survey / postcode data potentially combined with relevant TRICS data would be more appropriate. The mode share for taxi and motorcycle has been amended to zero as '*no motorcycle parking for staff would be provided on site*'. However, the TA (Paragraph 3.11) states that there are motorcycle parking facilities in the vicinity of the site and that there are existing taxi drop-off areas (Paragraph 3.17.13) surrounding the site, suggesting potential for some travel by these modes.

Students

The student mode share for the site has been derived from TRICS. As identified in Table 5-3, only one TRICS site was used – a university site in Uxbridge. This is considered to be an acceptable TRICS site to determine the education trip rates, subject to suitable adjustments being made to reflect the car-free nature of the proposed development.

Trip Rates

Plot 1 – Medical Research Centre, Outpatient Facility and café

Trip rates for Plot 1 have been calculated through a combination of first principles approach and trip rates obtained from TRICS.

Plot 1 – Outpatient and MRI Facility Trips

The applicant has identified that the 25 consultation rooms will each generate four appointments per hour across a 12-hour period. Clarification on whether

four appointments an hour is the maximum possible or an average should be provided.

Paragraph 5.3.11 states that “*Earlier discussions with UCL staff indicated that 10% of all patients trip to Plot 1 would be by vehicle; either taxi/car or patient transport*”. Evidence supporting this assumption should be provided within the TA.

It has been assumed that the remaining 90% of patient arrivals and departures for both the outpatient and MRI facility will occur by non-vehicle movement trips. These trips have been evenly distributed across the 12-hour period. It is likely that a proportion of patients will arrive at the site in advance of their appointment, potentially creating peaks across the day. The applicant should identify whether there is a pattern (i.e. % of patients who arrive early for their appointment) and factor this into the trip generation for Outpatient and MRI facility trips.

Plot 1 – Medical Research Facility Staff

As identified in paragraph 5.3.16, “*it is assumed that 70% of the staff would be present at any one time*”. Changes to the trip generation assessment have also been made to reflect the patterns of research work with operates outside normal hours. Evidence to support these assumptions should be provided within the TA.

To summarise, given the specialist national nature of the proposed facility, TfL would prefer survey data to be used rather than Census data, TfL is concerned that the equal distribution of trips across the day is not reflective of a typical scenario and as highlighted above, a number of assumptions have been factored into the assessment without supporting evidence.

Public Transport

Buses

The applicant has identified that the development will be a destination for visitors from across the UK and internationally. Given King’s Cross is a major central London hub for national rail services, access to Eurostar at St Pancras, and interchange between a number of London Underground services and bus routes, TfL considers that this will be where a considerable number of those visitors, and those from within Greater London, would initially arrive. As identified above, King’s Cross station is located approximately 750m to the south of the site.

The only bus route which provides a direct link from King’s Cross to the main entrance of the development is route 46. Given the distance from the station to the proposed development, TfL would expect a considerable number of Underground passengers and national rail passengers to use route 46.

Table 5-30 of the TA sets out the assumed distribution of bus trips by route. Route 45 has been withdrawn from Gray's Inn Road, and a number of routes (19,38,55,63,243 and 259) are greater than TfL's preferred walking distance of 400m. Taking this into consideration, it can be assumed that the majority of bus trips would be assigned to route 46 and 17. Given interchange and accessibility options at King's Cross it can be further assumed that a significant proportion of these would be assigned to route 46.

Table 5-23 assigns 182 AM peak trips (net) to the bus network. As noted above, this is likely to be supplemented by trips assigned to Underground and rail, which would subsequently be completed by bus. Route 46 runs at capacity and any additional demand would require the introduction of additional capacity. The buses in operation on route 46 have a planning capacity of 48. Given the links provided by route 46 and its proximity to the development, it can be assumed that in excess of 1/3 of bus trips would be assigned to route 46 in peak direction. Therefore, it is expected that a minimum service enhancement of 1 return journey and 1 single journey would be required to provide sufficient capacity. The estimated cost of the additional journeys is £170,000 per annum. Therefore, TfL requests a S106 contribution of £850,000 for a 5 year period to mitigate the site specific impacts of this development.

London Underground

The train frequencies identified in Table 3-6 of the TA are incorrect and/or inconsistent. Some of the numbers appear to relate to the frequency in one direction, while others are in both. The numbers provided in this table should be reviewed, and clarity provided on whether 'both directions' means the total of both directions, or in each direction. The frequencies identified within Table 5-28 should also be reviewed in light of the above. Furthermore, Table 5-28 does not identify Piccadilly line services that operate from King's Cross Station..

The additional 336 trips in the AM peak hour have been distributed on the lines passing through three stations (King's Cross, Chancery Lane and Russell Sq) in relation to the number of services. It does not appear that consideration has been given to the distance of the station for the site, especially Chancery Lane which is around 1km south, or the ultimate origin/destination which would indicate the direction of travel. It would be TfL's preference that the distribution of LU trips is based on a survey of existing users.

The TA does not include an assessment of line capacity assessing whether the additional demand generated from the proposed development can be accommodated. Similarly, no assessment has been made of station capacity in terms of the number of gates, width of staircases etc. Therefore, it is considered that there is little evidence provided to support the applicants' statement that "*The impact is deemed to be negligible*". The applicant should update the TA to include this information, and revise the conclusion as necessary. Once this work has been undertaken, TfL will assess the need for any mitigation.

Relocation of bus shelter

The applicant is proposing to relocate the southbound bus stop on Gray's Inn Road to better serve the pedestrian desire line into the site. Early engagement with TfL on these proposals has occurred.

TfL understands that Camden Council is planning to implement a segregated cycle lane on Gray's Inn Road adjacent to the site frontage. The applicant is proposing a floating bus stop, with the cycle lane sitting between the bus stop and pavement. Due to the nature of the proposed development, it is anticipated that there will be a higher number of vulnerable road users using this bus stop to access the world leading research centre and outpatient facility. In light of this, the proposed arrangement needs to be reviewed in more detail to ensure the safety of vulnerable road users crossing the cycle lane from the bus stop to access the proposed development.

TfL is working with Camden on the bus stop design and highway layout, and it is expected that further engagement will continue between the borough and the developer to ensure that a suitable design is found.

Healthy Streets

The applicant has carried out a Healthy Streets Check for Designers which concludes that the proposed development layout improves the quality of the environment for both cyclists and pedestrians, and removes one of the critical factors (effective width for cycling). It is noted that LB Camden's proposals to construct a protected cycle lane along this section of road contributes to indicators relating to people feeling safer, more relaxed, and choosing public and active transport modes over less sustainable methods. The TA should clearly set out how the development proposals, without Camden's cycle lane, deliver against the Healthy Streets criteria.

Furthermore, whilst there is an overall improvement within the score – from 61 to 70 - the proposed development layout results in a reduction in the score against the following criteria: 'Not too noisy', 'Things to see and do', 'Shade and shelter' and 'Clean Air'. The applicant should analyse their Healthy Streets Check, and identify measures i.e. replanting the tree that is to be removed to facilitate the bus stop relocation, to ensure that there is an improvement against all criteria. Where there is no improvement and/or reduction in scoring against a specific criterion, justification should be provided within the TA.

The applicant has undertaken an Active Travel Zone Assessment. As part of this assessment, a number of improvements to five routes to key transport destinations have been identified in Appendix I. Camden Council should work with the applicant to implement a number of these improvements, either through S106, S278 or use of BCIL as appropriate. The applicant has identified "Adding

additional signage such as Legible London and wayfinding” as an improvement. TfL would be happy to engage with the applicant further on this matter.

Vision Zero

Table 4-2 identifies the locations of casualty clusters within the Active Travel Zone (ATZ) and potential improvements to improve safety and reduce vehicle dominance. Due to the nature of the proposed development, ensuring key walking and cycling routes to and from the site are as safe as possible is of paramount importance. The applicant should work with the relevant highway authority to introduce the design solutions/mitigation measures identified within Table 4-2 and the Outcome Statement.

Walking and Cycling

Main pedestrian access to the site will be off Gray’s Inn Road between plot 1 and plot 2. A further pedestrian access will be provided through the existing gateway through the retained Alexandra Wing. A further pedestrian link through the site, which will connect to Langton Close will be provided. A new pedestrian/cycle link, which will connect the site to Cubbitt Street, and a pedestrian connection to the adjoining St Andrews Gardens is also proposed.

TfL welcomes the improvements to pedestrian permeability at this site. However, TfL are however, concerned in regards to the suitability of Langton Close as a pedestrian and cycle access in its current form, due to it also being the main servicing access and access to disabled parking provision. The applicant should review this route in light of Vision Zero principles, and demonstrate how interaction between vehicles, pedestrians and cyclists will be minimised.

It is understood that pedestrian access the site would be restricted between dusk and dawn via a gated access. Due to the public benefit that the proposed routes can bring, it is recommended that Camden Council secure public access to the aforementioned routes through appropriate mechanisms i.e. condition or Section 106. The minimum hours of opening should be identified within the condition/Section 106.

The applicant has carried out a Pedestrian Comfort Level (PCL) assessment for pedestrian flows outside the development entrance on Gray’s Inn Road. The assessment concludes that the proposed development will result in an improvement to Gray’s Inn Road (north, eastern footway) from F to a B+, and maintain a PCL level of A at Gray’s Inn Road (south, eastern footway). Improvements to pedestrian comfort outside the site is welcomed. It should be noted that the improvement to the PCL for Gray’s Inn Road (north, eastern footway) is associated with the relocation of the bus shelter, the details of which are yet to be agreed.

The development includes a new walking and cycling connection to Cubbitt Street, which will link the site to CS6. The creation of this route is broadly supported, however as advised at the pre-application stage, this route should meet minimum widths for shared spaces and provide a safe and attractive environment. Clarification on the width and further details on how this shared space will function should be provided.

Cycle Parking

365 long stay cycle parking spaces and 310 short stay cycle parking spaces are proposed. TfL notes that the applicant states that this level of provision as being greater than draft London Plan minimum standards. However, TfL are not able to confirm whether this is the case as there is no clear breakdown of the floorspace for the three different land uses on site: Medical Research Facility/Outpatient Facility, education, and café. Please provide clarification on the number of cycle parking spaces that is being provided for each land use.

It is noted that 72 cycle parking spaces will be provided to replace the existing cycle parking at Frances Gardener House. This is welcomed.

Long-stay cycle parking will be provided within the ground floor and basement of plot 3. Basement cycle parking spaces will be accessed via a dedicated staircase with integrated cycle gulley and/or service lift. The applicant should ensure that these are designed in accordance with the London Cycle Design Standards (LCDS)

The applicant states that provision has been made for cyclists with varying sizes of bikes and adapted bikes through providing a combination of two-tier, Sheffield and Camden M oversized stands. The TA should include information on the number of cycle spaces each stand type is presenting. In addition, clarity on whether the variation in cycle stands results in a provision of 5 per cent or larger cycle bays is requested. TfL welcomes the inclusion of 'end of journey' facilities at this site. These should be secured through condition.

Cycle Hire

As highlighted above, there are two cycle hire docking stations within the vicinity of the site; Wren Street and Ampton Street. It is projected that there will be an increase in demand within this area for cycle hire by 15 per cent. Wren Street is one of the busiest docking stations in the area; therefore any increase will take it over the limit and cause it to be full or empty for periods of times. Camden Council may wish to consider using CIL towards expanding this docking station to accommodate the increase in demand.

Vehicular Access and Patient Drop-off Bay

A patient drop-off facility is proposed within the site boundary, which will be accessed from a new vehicle access off of Gray's Inn Road. In line with the Mayor's Vision Zero objectives and TfL guidance, a Stage 1 Road Safety Audit

should be completed at the planning stage for any proposed highways works, not secured by condition.

For an ambulance to leave the site in forward gear from the on-site Patient Drop-off Bay, reversing will need to occur. With a possible high number of vulnerable road users at this site, TfL have some concerns. It would be preferable if the ambulances can enter and exit the site in forward gear, without the need for reversing. Further information on how the design/measures which will be in place to ensure that there is no/minimal interaction between vehicle movements and vulnerable road users.

Car Parking

The applicant is proposing a car-free development, which is welcomed. Five blue badge parking spaces will be provided; three for staff and two for visitors. This level of provision is in line with draft London Plan standards. All disabled parking spaces should be provided with electric vehicle charging points.

4 parking bays on Langton Close are to be removed or relocated to provide a waiting area for vehicles accessing the good yards. To support a reduction in car-dominance within this area, TfL's preference would be that the 4 parking bays are not relocated/reprovided. Any re-provision should be considered in the context of Langton Close being used as a pedestrian/cycle route and ensure potential for conflicts and car dominance is minimised.

Taxi

If possible, TfL would like to see a small 2 space taxi rank of 12m in length, incorporated into the plans for the site.

Framework Travel Plan

A framework travel plan has been submitted to support the proposed application. The applicant should ensure that their travel plan accords with the strategic modal shift target and aspirations contained within the Mayor's Transport Strategy. With high cycling potential within Camden, the applicant should consider stronger modal shift targets for this mode. A full travel plan should be secured.

Freight

Construction

An outline Construction Logistics Plan (CLP) and draft Construction Management Plan (CMP) have been submitted to support the application. To facilitate the construction of Plot 1, the applicant has identified the need to relocate an existing bus stop (HB) Approval will be required from TfL, and the applicant will need to demonstrate how this will not have a detrimental impact on the accessibility to services and bus operations within the vicinity of the site. Early engagement with TfL Buses on this matter is encouraged.

It is understood that pedestrian crossing will need to be closed to enable construction activity. The applicant will need to demonstrate how construction of the proposed development will not have a detrimental impact on pedestrian and cyclist movement, safety and comfort. Construction of the proposed development should impact on the function and safety of CS6.

Without origin and destination data and further information on planned , TfL are reluctant to agree the construction vehicle routing. TfL are happy to engage with the applicant on this matter, and confirm routes as part of a detailed CLP, which should be secured through condition. The construction routing should demonstrate that HGVs will not need to make left turn manoeuvres on CS6.

A full CLP and CMP should be secured through condition.

Deliveries

It is welcomed that delivery and servicing of the proposed development will take place in a off-street basement level good yards. The applicant has provided a Delivery and Servicing Plan (DSP) to accompany this application.

The aspiration to reduce deliveries from 34 to 30 vehicles through consolidation is welcomed. The swept path analysis included within the DSP indicates that there will be encroachment onto the pathway. As highlighted above, TfL have concerns in regards to pedestrian movement within this area and request that the applicant re-look at this area in light of Vision Zero and Healthy Street principles.

Mayoral Community Infrastructure Levy (MCIL)

In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (MCIL) came into effect on 1st April 2012.

For Camden there is a rate of £80 per sqm (as indexed) for qualifying developments in this borough. The applicant should ensure that they are fully aware of the regulations

Summary

To summarise:

- Trip Generation and mode share should be revised to take into account the national catchment and specialist function of the proposed development.
- Further engagement with TfL and LB Camden in regards to the relocation of the bus stop is required.
- Financial contributions to mitigate the site-specific transport impacts of the development are required for bus capacity.

- TfL welcomes the improvements to pedestrian permeability at this site. However, the applicant should review Langton Close, which also provides vehicular access to the servicing area and disabled parking, in line with Vision Zero and Healthy Street policies.

I trust this provides you with clear understanding of TfL's position on this application. Please do not hesitate to contact me if you have any questions.

Yours sincerely

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