



F.A.O Jonathan McClue

**TfL Spatial Planning Reference:** CMDN/19/291

**Borough Reference:** 2019/4478/P

**Location:** Panther House, 38 Mount Pleasant The Brain Yard, 156-158 Gray's Inn Road 160-164 Gray's Inn Road London WC1X

**Proposal:** Redevelopment of the site to deliver approximately 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Gray's Inn Road, approximately 229sq.m of A1/A3 uses at the ground floor level of Gray's Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Gray's Inn Road building. The proposals include the retention, refurbishment and part 2, part 3 storey roof extensions of Panther House; retention and refurbishment of the Tramshed at Brain Yard; demolition of 156 and 160-164 Gray's Inn Road and the construction of a new 7 storey building. Associated works include roof terraces at various levels of the building; plant equipment; cycle parking; landscaping works.

Many thanks for consulting TfL, with regard to the above application, TfL offer the following comments:

1. The proposed development has frontage onto the A5200 (Gray's Inn Road) which forms part of the Strategic Road Network (SRN). TfL have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
2. The draft London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is expected that all planning decisions within London should follow London Plan policies. As such, TfL will be expecting all new planning applications to be compliant with the policies as set out in within the new draft London Plan.
3. TfL welcomes that the proposed cycle parking provision is in excess of current (Policy 6.13) and draft London Plan (Policy T5) minimum standards. TfL further supports the car free nature of the proposed development.
4. P108 of the Design and Access Statement (DAS) states that cycle parking provision will be provided using a combination of Sheffield cycle stands and 2 tier cycle parking racks, with a minimum of 5% provision in Sheffield cycle stands. Policy T5 of the draft London Plan states cycle parking should be designed and laid out in accordance with the guidance contained in the TfL London Cycling Design Standards (LCDS). Within the LCDS, section 8.2.1 (Cycle Parking for All) sets out that at least 5% of spaces should be capable of accommodating adapted or larger cycles. TfL reminds the applicant that Sheffield stands alone do not meet this requirement. Per the LCDS, The most practical method is to ensure that stands are provided in short

runs with large gaps between runs to allow a larger cycle to be secured to each end stand. From the plans submitted it is not evident that this has been considered. Therefore, TfL requests that cycle parking plans are amended to reflect this.

5. Section 8.4.2 of the DAS states that access to the basement level office cycle parking will be provided via a hydraulic lift access platform as well as a cycle channel on the staircase. From the plans submitted the lift dimensions are not clear. TfL seeks clarification on the lift dimensions and reminds the applicant that to be LCDS compliant, lifts should have minimum dimensions of 1.2 by 2.3 metres, with a minimum door opening of 1000mm in order to accommodate all types of cycle. This should be amended and reflected in any updated plans.
6. Section 8.2.2 (Swept Path Analysis) of the submitted DAS demonstrates that a typical delivery vehicle would need to reverse into the site. TfL requests that vehicles can enter and exit the site onto and from the public highway safely in a forward gear. This would support the delivery of Vision Zero of the Mayors Transport Strategy (MTS), which sets out the Mayors long-term vision to reduce danger on London's streets so that no deaths or serious injuries occur. This Vision Zero will be achieved by designing and managing a street system that accommodates human error and ensures impact levels are not sufficient to cause fatal or serious injury. This will require reducing the dominance of motor vehicles and targeting danger at source.
7. TfL considers the approach to trip generation and modal split acceptable and in line with current London Plan Policy 6.3 and draft London Plan Policy T6.2 of the draft London Plan.
8. TfL requests that residents are excluded from applying for parking permits in the local CPZ and that this is secured through a section 106 agreement.
9. TfL welcomes the submission of a draft Construction Logistics Plan (CLP). TfL requests that a detailed CLP, as referred to in the current London Plan policy 6.3, is submitted to and approved by LB Camden in conjunction with TfL before construction work commences on site. TfL further requests this is secured by condition and discharged in consultation with TfL.
10. TfL welcomes the submission of a Delivery and Servicing Management Plan. TfL requests that a full Delivery and Servicing Plan (DSP), as referred to in the London Freight Plan, is submitted to and approved by LB Camden in conjunction to TfL prior to occupation. TfL further requests that this is secured by condition and discharged in consultation with TfL.
11. The footway and carriageway on the A5200 (Grays Inn Road) should not be blocked during the construction of the proposed development. Temporary obstructions during the conversion should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A5200 (Gray's Inn Road). All vehicles should only park/stop at permitted locations and within the time periods permitted by existing on-street restrictions.

**Subject to the above being addressed and reflected in any updated plans, TfL would have no objections to this application on strategic transport grounds.**

If you have any queries regarding this response please do not hesitate to contact me.

Many thanks,

Max

**Max Faulkner**

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