Transport Statement

70 Gray's Inn Road

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Prepared for Euro Properties





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Transport Statement

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Introduction

1.1 Overview

- 1.1.1 Markides Associates (MA) have been appointed by the Euro Properties, hereafter referred to as the 'Applicant', to prepare this Transport Statement (TS) in support of an application for a change of use of part of the existing premises from B1(a) offices to B1(a)/D1 non-residential Institution, at 70 Gray's Inn Road ('the site').
- 1.1.2 The site is located within the authority area of the London Borough of Camden (LBC), which acts as both the relevant planning and highway authority.
- 1.1.3 A site context plan is included as **Figure 0.1**, shown in the extract below and reproduced at scale at the end of this report.



Figure 0.1 Site Context Plan

1.1.4 As illustrated in **Figure 0.1**, the building is opposite Gray's Inn and a short walk from both Chancery Lane and Farringdon stations. The site is bound to the west by Gray's Inn Road, to the north by Portpool Lane, and to the south by Verulam Street. The east of the building is bound by the landscaped square of the six storey residential block located further east of the site.

1.2 Existing Site

1.2.1 70 Gray's Inn Road is a self-contained office building, currently named Verulam Gardens, and consists of seven storeys including a lower ground floor. The building is entered centrally off Gray's Inn Road and is currently understood to be vacant.



- 1.2.2 In April 2019, an application (LPA Ref: 2019/1153/P) covering external elevation alterations at ground and first floor levels to facilitate the creation of a café space ancillary to the office use, three new entrances, and internal alterations to form dedicated cycle and refuse stores was submitted. Permission was granted for these works by LBC in September 2019.
- 1.2.3 In accordance with the September 2019 planning permission, the landlord is currently undertaking refurbishment works in the lower ground to second floors, including:
 - Creation of a new entrance on the corner of Portpool Lane,
 - Creation of a café on the southern half of the ground floor
 - Formation of a new large shower facility at lower ground level providing 1 accessible,
 4 female and 4 male showers to support cycle storage at lower ground level
- 1.2.4 In October 2019, an application by the University of Lincoln was submitted to support the change of use of the lower floors of the building as educational space (Class D1). Whilst a resolution to grant was made, the application was withdrawn by the University of Lincoln prior to completion of the S106.
- 1.2.5 This application, on behalf of Euro Properties, seeks the same amendments to that as sought in October 2019, however, recognising the 2020 Use Classes Order (UCO) with proposals to convert the lower floors of the building as educational space (Class F1 under 2020 UCO).

1.3 Pre-application Advice

1.3.1 In September 2020 a pre-application meeting was held with LBC in relation to the proposed change of use. As part of the feedback from this pre-application process, LBC officers made the following request:

"We would ask for a transport assessment (or transport statement) to be submitted with any subsequent planning application. This would include a trip generation assessment as well as details on car parking, cycle parking and servicing. Cycle parking would need to be provided in accordance with CPG Transport and the minimum requirements of the New London Plan. Ideally the building would be car-free except for any disabled parking requirements. Please ask the applicant to refer to Policies A1, T1, T2, T3 and T4, and CPG Transport when preparing the transport assessment (or transport statement) to be submitted with any subsequent planning application." [LBC Office Feedback – received 19/09/2019]

1.3.2 On the basis that this 2020 application remains consistent with the scheme for which pre application advice was sought in September 2019, this TS has been prepared in recognition of this advice to demonstrate the technical details of the application from a transport perspective, including details of car parking, cycle parking and servicing.

1.4 Development Proposals

1.4.1 The current change of use proposals supported by this TS consist of the change of use of the lower floors of 70 Gray's Inn Road to from Office (Class E 2020 UCO) to Educational Space (Class F1 2020 UCO).



1.4.2 The proposed change of use will not alter the existing footprint of the building, with existing and permitted pedestrian access into the building remaining unaffected by the proposals. Reflecting the existing building and those under the September 2019 planning permission, the proposed use will be car-free in nature with cycle parking provided in accordance with the Draft London Plan (2019).

1.5 Report Structure

- 1.5.1 The remainder of this Transport Statement is structure as follows:
 - **Section 2:** Policy Context provides a brief overview of relevant national, regional and local policies and parking standards;
 - **Section 3:** Existing Conditions describes the existing site use and location, as well as all existing transport infrastructure and conditions within the area, including the surrounding pedestrian, cycle, public transport and highway networks;
 - **Section 4:** Development Proposals describes the proposed scheme in detail alongside the trip generation characteristics of the development;
 - Section 5: Conclusion provides concluding remarks.



Policy Context

2.1 National Planning Policy

The National Planning Policy Framework (NPPF) (February 2019)

- 2.1.1 The NPPF sets out Government planning policy, provides a framework within which local planning policies should be produced and is a material consideration in planning decisions.
- 2.1.2 With regards to transport, the NPPF identifies that all developments which generate a significant amount of movement should be supported by a TA and that planning decisions should take account of whether:
 - Appropriate opportunities to promote sustainable transport modes can be or have been – taken up, given the type of development and its location;
 - Safe and suitable access to the site can be achieved for all users; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigates to an acceptable degree.
- 2.1.3 The NPPF outlines 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," (Paragraph 109).
- 2.1.4 With regards to car parking, the NPPF does not include any standards and recommends that local planning authorities standards are based on the accessibility of the development, availability of public transport and local car ownership levels.

2.2 Regional Planning Policy

The London Plan (2016) / Draft New London Plan (2019)

- 2.2.1 The London Plan sets out the integrated economic, environment, transport, and social framework for the development of London over the next 20-25 years. The London Plan was adopted in January 2011, and has subsequently been revised a number of times, with the most recent being the Minor Alterations to the London Plan 2015, which were published in March 2016.
- 2.2.2 A draft of the New London Plan was published in 2017 with subsequent amendments following consultation in 2019, hereafter referred to as the Draft London Plan (2019). Whilst the Draft London Plan (2019) is yet to be adopted it is considered to be a material planning consideration following Examination in public during 2019.
- 2.2.3 Specific transport policies are described within Chapter 6 of the London Plan. Without reproducing the detailed content of each policy, integrating transport and development is the central theme, with an aspiration to encourage development that reduces the need to travel, especially by car, and locating developments that generate high levels of trips at



locations with either current or committed high levels of accessibility to public transport, cycling and pedestrian networks.

2.2.4 With regards to cycle parking, the following minimum cycle parking standards are set out within the Draft London Plan (2019).

Table 0.1 Draft London Plan (2019) Cycle Parking Standards

Land Use	Long-stay	Short-stay
B1 Business Offices	1 space per 75 sqm	First 5,000 sqm: 1 space per 500 sqm 1 space per 5,000 sqm thereafter
D1 Universities and Colleges	1 space per 4 staff + 1 space per 20 FTE students	1 space per 7 FTE students

2.3 Camden Local Plan (2017)

- 2.3.1 The Camden Local Plan is the primary strategic document in the local development framework, setting out long term spatial vision and strategic objectives for future developments in the area.
- 2.3.2 With respect to transport, Local Plan Policies A1, T1, T2, T3 and T4 are key, and are outlined below.

Policy A1 Managing the impact of development

2.3.3 This policy requires the transport impacts of a development to be addressed through the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.

Policy T1 Prioritising walking, cycling and public transport

2.3.4 This policy promotes sustainable transport by prioritising walking, cycling and public transport in the borough.

Policy T2 Parking and car-free development

2.3.5 All new developments in LBC are required to be car free.

Policy T3 Transport Infrastructure

2.3.6 The borough will protect existing and proposed transport infrastructure.

Policy T4 Sustainable movement of goods and materials

2.3.7 This policy relates to minimizing the movement of goods and materials by road.



2.4 Camden Planning Guidance – Transport (2019)

- 2.4.1 The Camden Planning Guidance (CPG) forms a Supplementary Planning document for the Camden Local Plan and provides guidance on detailed transport issues within the borough. Relevant to this application, it provides details on Transport Assessment requirements as well as car and cycle parking requirements.
- 2.4.2 The CPG also outlines the possibility for meeting disabled parking standards through onstreet parking bay opportunities.

2.5 Policy Compliance

2.5.1 This Transport Statement will demonstrate that the proposals are compliant with the aforementioned planning policies, highlighting the accessibility elements of the site that make it appropriate for B1(a)/D1 use and for adopting a car-free strategy.



Existing Conditions

3.1 Site Location

- 3.1.1 The site is located at 70 Gray's Inn Road as shown in Figure 1.1. It is approximately 300m walking distance north of Chancery Lane station, 700m west of Farringdon station and 850m east of Holborn station.
- 3.1.2 The site is bound to the west by Gray's Inn Road, to the north by Portpool Lane, and to the south by Verulam Street. The east of the building is bound by the landscaped square of the six storey residential block located further east of the site.

3.2 Existing Use and Site Access

- 3.2.1 The site is currently occupied as a self-contained office building constructed in the 1990s, and consists of seven storeys including a lower ground floor. The building is currently understood to be vacant.
- 3.2.2 At present pedestrians enter the building through the central access off Gray's Inn Road. However, as part of the September 2019 planning permission three new pedestrian entrances to the building were created. This will include a new entrance on the corner of Portpool Lane which will serve only the proposed Educational Space, a new entrance on the corner of Verulam Street, and a new fire exit on Portpool Lane at the far eastern side of the building.
- 3.2.3 A servicing access point is positioned on Verulam Street, where the cycle parking to the site can also be accessed.

3.3 Local Highway

- 3.3.1 The A5200 Grays Inn Road is an important road in the Bloomsbury district. It runs broadly north to south, connecting King's Cross and St Pancras stations with the City of London boundary, where it bisects High Holborn. The site is located on the southern part of Grays Inn Road. The road operates as a single carriageway, with two lanes in each direction. The kerbside lanes are often occupied by parking bays, including several bus stops, and there are a various single and double yellow lines restrictions. 20mph speed restrictions are in place on Grays Inn Road, and throughout the area surrounding the site. The area falls under a Controlled Parking Zone (CPZ), and the parking bay fronting the site on Gray's Inn Road is for permit holders only.
- 3.3.2 Portpool Lane is a minor no through road running east to west, that has a number of residential sites along its length. The site sits south of its junction with Grays Inn Road. Portpool Lane provides parking along most of its length for cars and motorcycles, in Pay & Display, Permit Holder and designated bays. The road does not allow vehicular access to Hatton Wall, which continues east of the site, and an emergency access barrier is in place for fire access. A 20mph speed restriction is also in place.



3.3.3 Verulam Street is also a minor no through road running east to west. The site sits north of its junction with Grays Inn Road. There are five Pay & Display parking bays in place, and a 20mph speed restriction is also in place here.

3.4 Parking Controls

- 3.4.1 The area falls under LBC's Controlled Parking Zone (CPZ). The parking bay fronting the site on Grays Inn Road is part of Controlled Parking Zone MKT, and is in operation Monday Friday from 10:00-15:30. It has capacity for approximately 5 vehicles. Further south of the site there is another similar bay with capacity for approximately 4 vehicles.
- 3.4.2 Portpool Lane partly falls under Zone MKT adjacent to the site, while the majority of it is under Zone CA-D, along the northern side of the road. The Zone CA-D resident permit holder bays are in operation Monday Friday from 08:30-16:30 and Saturdays from 08:30-13:30. There are approximately 6 Pay & Display spaces on Portpool Lane allowing vehicles to be parked for up to 2 hours with no return within 2 hours. These bays are in operation Monday Friday from 08:30-16:30 and Saturdays from 08:30-13:30. A single disabled bay is positioned approximately 60m east of the junction with Grays Inn Road, on the southern side of Portpool Road.
- 3.4.3 The Pay & Display bays on Verulam Street are also in operation Monday Friday from 08:30-16:30 and Saturdays from 08:30-13:30, with a total capacity of approximately 5 vehicles. There is a single business permit holder bay towards the eastern end of Verulam Street.

3.5 Pedestrian Accessibility

- 3.5.1 Gray's Inn Road benefits from good footways of approximately 3m width on both sides, allowing pedestrians to walk comfortably side by side. Street lighting is also present on both sides of the road.
- 3.5.2 Portpool Lane also benefits from good pedestrian footways, with widths of approximately 1.5m at its junction with Grays Inn Road, widening to approximately 2.5m at points further east. There is street lighting along both sides. Verulam Street has footways on both sides of the road for approximately half its length, with a footway present only along its southern side in its eastern half. The footways here are approximately 1.5m in width, and there is street lighting along one side. It is possible to walk between Portpool Lane and Verulam Street through the residential development east of the site.
- 3.5.3 A zebra crossing is positioned approximately 90m south of the site, immediately north of the junction between Grays Inn Road and Baldwin's Gardens. There is also a pedestrian crossing approximately 120m north of the site, at Grays Inn Road's junction with Clerkenwell Road and Theobalds Road. This provides pedestrians with a choice of safe crossing points in the vicinity of the site.
- 3.5.4 The main pedestrian routes to and from the site are considered likely to be to the stations closest to the site Chancery Lane 300m walk distance to the south, Farringdon 700m walk distance to the east, and Holborn 850m walk distance to the west. The route to Chancery



Lane is direct along Grays Inn Road, with access to the station being at the junction of Grays Inn Road with High Holborn. Pedestrians will be able to access the site to and from the station without having to cross any major roads. The route to Farringdon is along a series of smaller roads including Dorrington Street and Greville Street, which are pedestrian friendly. The route to Holborn is via Grays Inn Road and High Holborn. High Holborn is a key road which has a large number of amenities and carries a number of bus routes.

3.6 Cycle Accessibility

3.6.1 TfL Cycle Superhighway are established cycle routes that link communities, businesses and destinations across London. Cycle SuperHighway 6 (CS6) operates close to the site, providing a route between King's Cross and Elephant and Castle. It runs north to south along Saffron Hill and Farringdon Road, bringing it within 500m of the site at its closest point. A map extract showing the location of CS6 in relation to the site can be seen below in **Figure 0.1**.



Figure 0.1 Cycle Superhighway 6

3.7 Public Transport

Public Transport Accessibility Level (PTAL)

- 3.7.1 Public Transport Accessibility Level (PTAL) provides a measure of a specific location's accessibility to public transport. PTALs are measured on a scale of 1 to 6b, with 1 being the lowest level of public transport accessibility and 6b being the highest.
- 3.7.2 The PTAL for the site has been sourced from the TfL land use planning website, WebCAT, which identifies the site as having a PTAL rating of 6b, demonstrating the site's excellent accessibility to public transport.



3.7.3 The site location in relation to established public transport network within is detailed in **Figure 0.2**Error! Reference source not found. and described below.

Site Location

Bus Stops

Zipcar Space

Asian

Asia

Figure 0.2 Public Transport Plan

Bus Accessibility

3.7.4 The PTAL rating is achieved based on the site being within an acceptable walk distance of a number of bus services which are summarised below in **Table 0.1**.

Table 0.1 Local Bus Services

Bus Stop	Bus Route	Route	Daytime Frequency (Vehicles per hour)
Holborn Hall	46	Lancaster Gate – Warwick Avenue Station – Hampstead – King's Cross - Smithfield	6
Holborn Hall	17	Archway – King's Cross – Holborn Circus – London Bridge	7.5
Holborn Hall	45	Clapham Park – Brixton – Elephant & Castle	7
Holborn Hall	341	Lea Valley Tesco – Tottenham – Manor House – Farringdon - Waterloo	6
Holborn Hall	243	Wood Green Station – Shoreditch – Holborn - Waterloo	11



Holborn Hall	38	Clapton – Holborn – Piccadilly Circus - Victoria	10
Holborn Hall	olborn Hall 19 Battersea Bridge – Hyde Park Corner Holborn – Finsbury Park		8
Holborn Hall	55	Leyton Green – Hackney – Holborn – Oxford Circus	10
Chancery Lane Station	8	Bow – Bethnal Green – Bank – Tottenham Court Road Station	10
Chancery Lane Station	521	Waterloo – Aldwych – Cannon Street – London Bridge	27
Chancery Lane Station	242	Homerton Hospital – Dalston - St Paul's – Tottenham Court Road Stn	6.5
Chancery Lane Station 25		Ilford – Forest Gate – Whitechapel – Bank – City Thameslink	8
Mount Pleasant 63		Honor Oak – Elephant & Castle – King's Cross	12

3.7.5 **Table 0.1** demonstrates there are a large number of frequent bus services operating within walking distance of the site, serving key destinations across London.

Underground and Rail Accessibility

- 3.7.6 The nearest stations are located within walking distance of the site. Chancery Lane station is 300m walk distance south of the site, Farringdon is 700m walk distance to the east and Holborn station is 850m walk distance to the west.
- 3.7.7 Chancery Lane and Holborn stations both provide access to the London Underground Central line. The Central line provides access to Liverpool Street, Tottenham Court Road and Oxford Circus amongst other stations with a high frequency service.
- 3.7.8 Holborn station also provides access to the London Underground Piccadilly line. The Piccadilly line provides access to King's Cross St Pancras, Green Park and South Kensington amongst other stations with a high frequency service.
- 3.7.9 Farringdon station provides access to the Circle, Hammersmith & City and Metropolitan lines. These provide access to King's Cross St Pancras, Euston and Baker Street. Farringdon Station also provides access to National Rail Thameslink services, which provides services to destinations including Brighton, Sutton and Bedford.
- 3.7.10 All these stations as well as being destinations in their own right, also offer the opportunity to interchange with other London Underground lines or National Rail services.

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Car Club

3.7.11 There is a Zipcar car club space on Portpool Lane located immediately west of the junction with Grays Inn Lane adjacent to the site. Its location can be seen in **Figure 0.2**

3.8 Summary

3.8.1 In summary, the site benefits from being in a highly accessible location, with established pedestrian and cycle networks, allowing future users of the site ample opportunity to adopt the most sustainable forms of travel. The site is also highly accessible to local public transport infrastructure, including bus routes and London Underground stations and is located within an established CPZ, facilitating low car reliance.



Development Proposals

4.1 Proposed Development

- 4.1.1 The applicant is seeking planning permission for the change of use of the existing premises from E Office to F1 Educational Space The applicant is intending to lease part of the lower ground, ground, and the entirety of the first and second floors of the refurbished building equating to a Gross External Area of approximately 1,900m² to an educational institution once planning permission has been granted.
- 4.1.2 Whilst the applicant is seeking permission to change part of the land use of the building to Class F1, the operation of the building will more closely align to that of an office with the majority of the space being used as student and staff workspace with a series of working desks, meeting rooms and communal spaces.
- 4.1.3 The space is designed to allow students of higher education institutions to engage with potential employers, facilitate co-working space and help foster enterprise in its graduates and therefore provide:
 - A base for students who are studying and are seeking the experience of working in London to develop their careers and portfolios while studying; and
 - A home for business innovation for entrepreneurs from the local area providing coworker officer space for a range of industries that could be supported by a higher education institute as a tenant.
- 4.1.4 The proposals do not include formal teaching spaces (such as lecture theatres and seminar rooms). As a result, in transport terms, the trip characteristics of students and staff will more closely resemble that of an office than a traditional university campus building with likely arrival in the AM peaks and departures in the PM peaks with dwell times within the building across the majority of the day.

4.2 Access

- 4.2.1 Pedestrian and cyclist access into the building will remain unchanged and in accordance with the September 2019 permission. Pedestrians will access the proposed building from the Ground Floor at Gray's Inn Road. Cyclists will access the building from the rear via the existing rear pedestrian route accessed from either Portpool Lane or Verulam Street.
- 4.2.2 The proposals do not intend to result in any changes in the established delivery and servicing access strategies with servicing activity to continue from the existing point of servicing, deliveries and waste on Verulam Street. Servicing and waste activity would continue to be managed by the landlord as per the existing arrangements.



4.3 Parking

Cycle Parking

- 4.3.1 Cycle parking associated with the proposed development will be provided in accordance with the Draft London Plan (2019) cycle parking standards for offices (B1) land use [reflecting the previous UCO which has not yet been reflected within the standards]. This reflects the likely occupation and trip characteristics of the site as described above.
- 4.3.2 Table 4.1 provides a summary of the required cycle parking provision to meet the Draft London Plan (2019) standards for B1 offices.

Table 0.1 Proposed Cycle Parking Provision

	Long-stay	Short-stay
Draft London Plan (2019) Standards: B1 Business Offices	1 space per 75 sqm	First 5,000 sqm: 1 space per 500 sqm, 1 space per 5,000 sqm thereafter
Proposed Provision	26	4

- 4.3.3 As shown in Table 4.1, to be compliant with the Draft London Plan (2019) standards a total of 30 cycle parking spaces are required.
- 4.3.4 The applicant will have access to the rear of the building where a dedicated cycle store will be provided for the tenant of the space. This will provide space for a minimum of 30 cycle parking spaces, with the intention that this store would be used for both short and long stay cyclists. The proposed arrangement of the cycle store, which has been designed by the landlord's architects, is provided in Appendix A. The proposals are therefore considered to be compliant with the Draft London Plan (2019).
- 4.3.5 In addition to the above the applicant is also exploring the provision of Brompton Cycle Lockers within the Reception area of the building to accommodate users of flexi-bikes.

Car Parking

- 4.3.6 The development is proposed to be car-free which is considered appropriate given the site's highly sustainable location.
- 4.3.7 For any users of the site requiring access to a disabled parking bay there is an existing disabled parking bay on Portpool Lane which is approximately 50m from the entrance to the site. There is also an existing disabled parking bay on Baldwin Gardens approximately 100m from the entrance to the site.



Refuse Storage and Collection

4.3.8 A refuse store is provided within the landlord area to the rear of the building, as also shown in Appendix A. Refuse will be collected in accordance with the existing building regime by the landlords appointed contractor from Verulam Street, with collection likely to be combined with collection of waste for other tenants within the building.

4.4 Trip Generation

- 4.4.1 As outlined above, despite the change of use associated with the application the building will in practice operate in a similar means to an Office (Class E 2020 UCO) with longer dwell times of occupants through the day as staff and students make use of the facilities provided within the co-working and learning spaces.
- 4.4.2 The site has an existing permission for use as an Office (Class E 2020 UCO) and as a result the development proposals are not considered to result in a significant change to the travel characteristics and trip generation profile of the existing and refurbished building associated with the implemented September 2019 planning permission.
- 4.4.3 Given the excellent public transport accessibility within the vicinity of the site, the existing high quality walking and cycling networks surrounding the site and the lack of car parking associated with the proposals it is anticipated that the overwhelming majority of staff and students would travel to the site using sustainable modes.
- 4.4.4 Considering that the number of trips associated with the proposed development is likely to be similar to that of the existing use and that as approved under the September 2019 planning permission, the proposals are not considered to result in any significant change in the number of trips in peak periods. The development is not therefore considered to result in any significant impact upon the local transport networks.

4.5 Summary

- 4.5.1 The development proposals do not result in any significant changes to how the building will be accessed or serviced. Cycle parking will be provided in accordance with the Draft London Plan (2019) standards and the development is proposed to be car-free.
- 4.5.2 The use of the building by any future tenant will closely reflect that of the existing use. Given the car-free proposals, the cycle parking in accordance with the Draft London Plan (2019) and the wider excellent public transport, walking and cycling networks within the vicinity of the site, the proposals are not considered to result in any significant impact upon the local transport networks.



Conclusions

5.1 Summary

- 5.1.1 This Transport Statement (TS) has been prepared to support a planning application for the proposed change of use of part of the building at 70 Gray's Inn Road. Euro Properties is seeking permission to convert part of the building for use as educational space that will be focused upon co-working and learning (as opposed to teaching and lectures/seminars).
- 5.1.2 The proposed change of use will not alter the existing footprint of the building, with existing and permitted pedestrian access into the building remaining unaffected by the proposals. The building will remain car-free in nature with cycle parking provided in accordance with the Draft London Plan (2019) standards. Servicing, delivery and refuse activity will be conducted in line with the existing delivery and servicing strategy of the site.
- 5.1.3 The site is located in a highly accessible area for sustainable transport modes. It has a PTAL rating of 6b demonstrating excellent access to public transport whilst it is within a reasonable walking and cycling distance of a wide range of facilities, stations and bus stops facilitating easy sustainable travel.
- 5.1.4 The proposed change of use is not considered to materially affect the number or mode share of trips entering and exiting the site in relation to the existing permission given that the proposed use, whilst associated with educational space, will operate more like a traditional workplace with various co-working spaces, learning centers and offices for both students and staff without any formal teaching facilities.
- 5.1.5 In summary, the development proposals are not considered to result in a significant impact upon the wider local transport networks with no significant change to the number of trips across the local transport networks. The impact of the proposals are therefore considered to be negligible requiring no further mitigation other than that proposed as part of the application.



FIGURES

Optional Subtitle

Figure 3.1 Site Context Plan

Cycle Superhighway 6

Figure 3.2 Public Transport Plan



APPENDIX A – CYCLING / REFUSE STORE

