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By email only

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15th February 2021

Dear Jonathan

330 Gray's Inn Road, Royal National Throat, Nose & Ear Hospital, LB Camden - TfL Initial comments

Thank you for consulting TfL on this application. Please note that these comments represent an officer level view from Transport for London, made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project.

Site and Surroundings

The site is bounded by Wicklow Street to the north, Swinton Street to the south, the A501 Gray's Inn Road (GIR) to the west and the underground railway cutting to the east. All three streets are one-way clockwise and Swinton Street and GIR are part of the Transport for London Road Network (TLRN) Inner Ring Road. Five bus routes run along GIR which features a north-bound bus lane and stop opposite the site. The nearest southbound bus stop is 300m to the south-east on Kings Cross Road. There is a bus stand on Swinton Street across the road from the site.

The closest London Underground (LU) station is King's Cross, located 256m to the north-west with rail services accessed some 50m-150m further north from King's Cross railway station and St Pancras national/international station respectively. The majority of the site has a Public Transport Access Level (PTAL) of 6b (on a scale of 0 to 6b, where 6b is the highest).

There are three existing cycle hire stations within easy walking distance, the nearest being some 100m south west on Cromer Street.

Healthy Streets and Vision Zero

The Healthy Streets analysis and Active Travel Zone (ATZ) exercise covers the appropriate key destinations and routes and acceptably describes how the scheme delivers against key policy criteria of safe, convenient and attractive travel by non-car modes. These proposals to further improve permeability should be explored, including 24 access through the site.

Further measures and enhancements to the TLRN highway/public realm TfL requests include carriageway changes to improve conditions for pedestrians as well as free drinking water fountains in accordance with London Plan policy D7. Noting the location in a conservation area/next to listed buildings and that construction works are likely to damage existing footways, an upgrade to surrounding paving quality is supported by TfL for the TLRN and for Wicklow Street. There may be scope for York Stone paving and new trees.

Access and Servicing

A newly aligned access to the site will be provided from Swinton Street. A satisfactory capacity and design to serve all commercial uses has been demonstrated as well as in respect of deliveries and refuse collection associated with residential uses. A lift has been proposed alongside steps, behind the Swinton Street frontage to enable level access into this sloping site for people with disabilities, pushchairs or luggage. A further public access lift along the interior path from GIR is indicated. The minimum hours that these lift(s) are to be available for visitors through the site, and a retention and maintenance regime, should be secured via an appropriate legal mechanism.

A Servicing Management Plan will be secured by condition to manage impact on the TLRN and furthermore Camden Council is urged to exercise flexibility with the permitted servicing hours and considers night-time activity should be acceptable in this central London location.

A stage 1 Road Safety Audit (RSA) advises that waiting restrictions should be amended to manage the new access. This will be subject to further design work and delivered through Traffic Order consultation.

Roadspace: Future Plans, network impact and mitigation

TfL is proposing to deliver improvements on the northern section of Grays Inn Road in 2024 during Phases 2 or 3 of Kings Cross gyratory improvements. They will include a 20mph speed limit, a new crossing, and potentially additional trees and widened footways, alongside improvements to bus priority. Given the increased pedestrian demand from this development TfL requests a financial contribution to help timely delivery of this project. Further discussions about this matter are welcomed.

In addition, TfL considers that the redundant ambulance bays on Grays Inn Road should be reallocated for pedestrians or to enhance bus/cycle facilities. This congested section of TLRN is not considered suitable for taxis to stand, however there may be scope to allow stopping overnight, subject to further investigations. It should be noted that taxis are permitted to pick up or drop off passengers on single or double red lines.

Parking

The proposal for a car-free development is strongly supported in this highly accessible location. Clarification is sought on the final number and location of the disabled persons car parking.

Proposed long stay cycle parking meets the minimum quantum per land use required by PLP policy T6, with 5-10% a mix of Sheffield stands, half-height stands and ground fixings to accommodate non-standard/adapted bikes and encourage inclusive cycling. Short stay spaces are also to standard and positioned across the site near its entrances; these are supplemented by existing Sheffield stands located on Swinton Street (5 stands) and Gray's Inn Road (3 stands). Detailed plans of the storage and a requirement to maintain and retain cycle spaces for the life of the development are requested to be secured by condition.

Trip Generation, Mode Share

The largest mode increase is in walking, with an additional 1174 two-way pedestrians over the whole day. There is a net reduction in car passenger and taxi movements as part of the development proposals. The methodology and data appear robust.

Public Transport

Given the large choice of bus routes locally and the proximity of King's Cross Station and other routes on Euston Road and recent contributions to capacity secured from other development, TfL does not seek any mitigation for additional bus trips.

Net underground trips for the proposed development have been assigned to the various Underground lines as requested, based on NUMBAT data obtained from TfL. TfL accepts the forecast of a net increase of approximately 114 two-way Underground trips during the AM peak and 116 during the PM peak does not require any specific mitigation.

Infrastructure Protection

As noted above, the site adjoins a London Underground (LU) cutting. Details of any load change / ground movement (GMA / Impact Assessment), foundations and any works that could be a risk adjacent to this open section of the railway must be discussed and agreed prior to determination with LU Infrastructure Protection directly. They will recommend conditions on LU conditions/safety of the railway and specify the exact margin between the closest structure and the railway.

The applicant should clarify whether open inset balconies are still proposed in terms of agent of change principles with the railway cutting in the Wicklow Street building and where buses operate on a 24-hour basis on Swinton Street and Grays Inn Road.

Construction

The framework CLP does not cover the greater level of detailing and programming than usual that TfL sought given the need to protect the operation of TLRN, bus and rail infrastructure. Its observation that “there is adequate clearance [between the easternmost building line and the railway] which should not affect construction at the site” demonstrates a limited understanding. Once again it is requested the applicant liaises now with TfL’s Network Impact Management Team and its Infrastructure Protection (TfL assets) engineers. Further discussion about this matter is urged and Developer funding/mitigation for the impacts will be sought through the s278 process in line with recent development.

The Construction Logistics Plan (CLP) should also seek to minimise the impact the development has on Cycle superhighway 6 which crosses Grays Inn Road at Sidmouth Street to the south as well as other key pedestrian and cycle routes such as the planned segregated cycle route on GIR.

An acceptable framework Travel Plan for all land uses has been submitted. The applicant has expressed interest in funding limited cycle hire memberships for residents and/or office users to encourage cycling using the two nearby existing docking stations. Further discussion is sought.

Summary

Subject to the requested clarifications, mitigation of network impacts through TRLN improvement design/approvals, and any necessary Healthy Streets improvements, the proposals are in principle acceptable in strategic terms. These are required before the scheme can be considered to satisfactorily mitigate its highways and transport impacts.

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