

Project 330 Grays Inn Road
 LPA Ref 2020/5593/P
 Author Jack Williams
 Checked Julie Bowerman
 Date 04 March 2021


Technical Note

Project No. 23596101

Response to London Borough of Camden (LBC) and TfL Stage 1 Comments

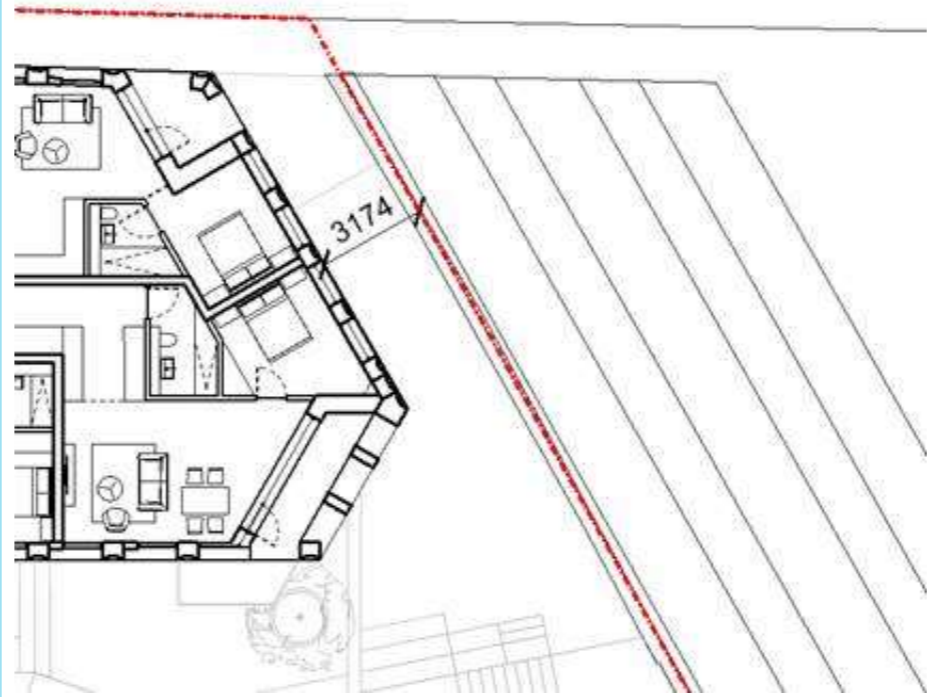
Ref.	Origin	Comment	Steer Response	LBC / TfL Response
Servicing and Deliveries				
1	LBC	Camden Local Plan 2017 Policy T4... developments greater than 2,500 sqm that are likely to generate significant movement of goods or materials by road will be expected to accommodate goods and service vehicles on site. Servicing is not limited to the delivery of goods; it includes items such as building maintenance. These activities often require vehicles to be parked for long periods. Accordingly, the loading bay area should be always available for the residential element of the development.	<p>As presented and discussed during pre-application meetings on 27 January 2020, 2 April 2020 and 8 July 2020, all servicing, delivery and maintenance vehicles associated with the residential buildings will wait on Wicklow Street and Swinton Street respectively where waiting and loading provision is proposed. No objections to this approach were raised from LBC on any occasion.</p> <p>Further, TfL agreed to this approach as confirmed in their formal pre-application response letter (dated 24 April 2020) provided at Appendix A: <i>“Servicing for the remaining residential land use is to be on-street from Swinton Street and Wicklow Street. TfL would usually resist new servicing on TLRN however, we recognise that there are already several on street ambulance bays and their removal would free up space. We also expect that servicing activity for the 80 residential units may be lower than former hospital trips. This should be confirmed in the transport assessment.”</i></p> <p>As demonstrated in the Transport Assessment, the residential land use is forecast to generate just 10 daily servicing, delivery and maintenance trips, or less than one per hour which will have no impact on the operation of the TLRN or Wicklow Street. Appropriate provision for on-street loading is proposed via the conversion of the redundant ambulance bay on Swinton Street, which sits outside of the running traffic lanes and in front of the bus stand, and Wicklow Street which already accommodates some kerbside loading activity and where appropriate lengths of single yellow line markings are proposed or retained.</p> <p>These loading areas are also required for refuse collection to comply with LBC’s stipulated 10m wheeling distances from the bin stores to the respective vehicle collection points. The strategy for on-street refuse collection for the residential elements was also agreed with LBC and TfL during pre-application discussions.</p> <p>As the commercial and residential elements will be managed separately and for security purposes, there are no connections between the commercial service yard and the residential uses, either at ground or basement levels. The strategy proposed by LBC is not therefore feasible.</p>	
2	LBC	A DSP should be submitted, approved, and secured via a section 106 planning obligation if planning permission is granted. Some issues, such as the inclusion of residential servicing in the service yard, would need to be addressed in the (final) DSP.	Agreed that the final DSP can be secured via a Section 106 planning obligation. The proposed residential servicing strategy and issues with allowing residential servicing in the service yard are addressed in item 1 above.	
3	LBC	The ambulance bay in Swinton Street is shown as being converted to a loading bay. This is not considered appropriate; the ambulance bay markings should be removed but the existing double red markings at the kerb line should remain.	This is not accepted as addressed in item 1 above.	

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4	LBC	Wicklow Street - The 'KEEP CLEAR' markings close to the existing service yard access will need to be removed and replaced with 'No Loading' markings.	This is not accepted as addressed in item 1 above. The 'KEEP CLEAR' markings are to be replaced with disabled parking bays and a 14m section of single yellow line markings to permit refuse collection and servicing to the Wicklow Street residential block.																																									
Cycle Parking and Facilities																																												
5	LBC	For the residential cycle parking, Table 3.2 of the TA shows a total of 122 Long Stay spaces for the two residential blocks. I need more information to determine whether this is in accordance with the London Plan as the requirements for 1-bedroom flats depend on whether they are 1-person or 2-person units and this is not stated. In the worst case, i.e., all 1-bedroom flats being 2-person dwellings, the required total of Long Stay spaces would be 130. Applying the worst-case scenario gives a shortfall of 8 spaces.	<p>The Publication London Plan (December 2020) standards have been applied correctly. The standards for long-stay residential cycle parking are as follows:</p> <ul style="list-style-type: none"> 1 space per studio or 1 person 1-bedroom dwelling; 1.5 spaces per 2 person 1-bedroom dwelling; and 2 spaces per all other dwellings. <p>All 1-bedroom dwellings are 2 person units, therefore the requirement is as follows.</p> <table border="1"> <thead> <tr> <th rowspan="2">Unit Type</th> <th rowspan="2">Publication London Plan (December 2020)</th> <th colspan="2">Block A</th> <th colspan="2">Block B</th> </tr> <tr> <th>Number of Units</th> <th>Cycle Parking</th> <th>Number of Units</th> <th>Cycle Parking</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>1 space</td> <td>0</td> <td>0</td> <td>17</td> <td>17</td> </tr> <tr> <td>1-bedroom 2 person</td> <td>1.5 spaces</td> <td>18</td> <td>27</td> <td>9</td> <td>14</td> </tr> <tr> <td>2 bedroom</td> <td>2 spaces</td> <td>8</td> <td>16</td> <td>16</td> <td>32</td> </tr> <tr> <td>3 bedroom</td> <td>2 spaces</td> <td>6</td> <td>12</td> <td>2</td> <td>4</td> </tr> <tr> <td>TOTAL</td> <td></td> <td>32</td> <td>55</td> <td>44</td> <td>67</td> </tr> </tbody> </table>	Unit Type	Publication London Plan (December 2020)	Block A		Block B		Number of Units	Cycle Parking	Number of Units	Cycle Parking	Studio	1 space	0	0	17	17	1-bedroom 2 person	1.5 spaces	18	27	9	14	2 bedroom	2 spaces	8	16	16	32	3 bedroom	2 spaces	6	12	2	4	TOTAL		32	55	44	67	
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6	LBC	Clause 8.21 of the Transport CPG states: For developments that require long stay cycle parking for staff, the Council will expect supporting facilities such as lockers, changing facilities, a drying room and showers to be provided. These should be located in such a way that is convenient and within close proximity to the cycle parking facilities... the London Plan (10.5.7) also supports the inclusion of lockers (at least two per three long-stay spaces are recommended) and shower facilities (at least one per ten long-stay spaces is recommended). The plan of the lower basement shows areas labelled Female Changing Room / Showers and Male Changing Room / Showers. There appears to be only one shower, which would be inadequate provision for a development with 198 Long Stay spaces. I cannot locate any lockers. The applicant needs to rethink the supporting facilities for cyclists.	<p>AHMM have developed an indicative layout showing how the supporting facilities for cyclists can be accommodated within the male and female changing rooms within the basement. The indicative layout which will be developed further through detailed design is included at Appendix B. This shows the layout can accommodate:</p> <ul style="list-style-type: none"> 208 lockers (1 for each cycle space) split between male / female (double & triple stacked lockers) 21 showers, including an accessible shower (1 for every 10 cycle spaces) 																																									
7	LBC	Need to have the internal dimensions of the cycle lifts to check whether they comply with the standards.	In accordance with LBC Transport CPG (November 2018) and Wheels for Wellbeing: A guide to inclusive cycling (November 2017) all shapes and sizes of non-standard cycles are captured within a 2.8m long and 1.2m wide criteria. Cycle lifts providing this appropriate internal depth will be selected during the detailed design stage.																																									
8	LBC	Figure 3.1 of the TA shows short-stay cycle provision in the carriageway. This contravenes Transport CPG clause 8.25: Short stay cycle parking must be located within the curtilage of a development and must not be located on the public highway. They would also restrict access to the adjacent parking bays and would overlay the cobbled paving in Wicklow Street, which should be preserved. An alternate location needs to be found.	<p>Careful consideration has been given to the provision of short-stay cycle parking to meet the Publication London Plan standards, but to locate stands in a way which is not detrimental to the new Wicklow Yard public realm or permeability through the site.</p> <p>Providing the additional 14 stands (28 spaces) within Wicklow Yard would be to the significant detriment of the public realm. As such, the design team have devised options which meet Publication London Plan requirements, are respectful of the historic surrounds and make best use of redundant kerb space for sustainable transport provision. As set out in the submitted Public Realm Planning Report produced by East (extract at Appendix C) the preferred option is to provide the new build-outs by reusing the existing cobblestones and kerb setts.</p> <p>As demonstrated in the Transport Assessment, large vehicles would still be able to pass unobstructed along Wicklow Street and refuse/delivery vehicles can comfortably manoeuvre within the proposed sections of single yellow line markings without obstruction. Sufficient allowance has been made between the proposed build outs so as not to restrict access to the adjacent parking bays.</p>																																									

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9	LBC	The TA states: ...5% of spaces provided using a mix of Sheffield stands, half-height stands and ground fixings to accommodate nonstandard/ adapted bikes and encourage inclusive cycling. Further details of the parking for nonstandard bikes are required.	<p>A minimum of 10% of residential long-stay cycle parking spaces will be provided for non-standard/adapted bikes. A minimum of 5% of commercial long-stay cycle parking spaces will be provided for non-standard/adapted bikes. As shown within the plans at Appendix F of the Transport Assessment, sufficient space has been provided within the commercial and residential basement areas to allow for a combination of spaces for non-standard cycles to be provided, including Sheffield stands, half-height stands and ground fixings. In accordance with the types of fixings presented in the Wheels for Wellbeing: A guide to inclusive cycling (November 2017), these will be selected at detailed design stage. Some examples are shown in the images below.</p> 	
Grays Inn Road Highway				
10	LBC	<p>The applicant proposes to remove two ambulance bays, one in Grays Inn Road, the other in Swinton Street. The layout shows the Grays Inn Road ambulance bays being converted to a taxi rank. I would not support this for the following reasons.</p> <ul style="list-style-type: none"> • There are other taxi ranks nearby outside Kings Cross and St Pancras stations. • The demand forecast indicates up to two outward trips in each of the peak hours for the proposed hotel. But this probably includes some minicab and Uber journeys as they are not separately identified, and the latter would not be eligible to use the taxi rank. The number of licensed taxis could be therefore less than that given in the estimate. A rank is therefore not justified. • Allowing taxis to wait at the former ambulance bay would exacerbate the extreme congestion that exists in the peaks at that location. • It would be contrary to Policy 1 of the Mayor's Transport Strategy which aims to reduce Londoners' dependency on cars. <p>The ambulance bay should revert to single red line markings.</p>	<p>The recommendation for repurposing the ambulance bay to a taxi rank was made by TfL in their formal pre-application response letter (dated 24 April 2020) provided at Appendix A: "New provision of a small taxi rank in place of the ambulance bays on the main frontage may be prudent for the new proposed hotel and the existing hotel on the corner of Gray's Inn Road and Swinton Street."</p> <p>The existing ambulance bay sits outside of the traffic running lane and directly in front of a loading bay which serves the Water Rats establishment which also provides loading Monday to Saturday 10-4pm. Removal of the ambulance bay will have no impact on congestion given its position in relation to the loading bay.</p> <p>It is accepted that there would be demand for other Private Hire Vehicles (minicabs, Uber etc), therefore rather than a formalised taxi rank, it is suggested that a drop-off bay with appropriate waiting restrictions is provided.</p>	
11	TfL	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.	As per item 10 above, the provision of a taxi rank was suggested by TfL. To provide a formalised arrangement which also allows Private Hire Vehicle (minicabs, Uber etc) use, it is suggested that a drop-off bay with appropriate waiting restrictions is provided.	
Pedestrian, Cycling and Environmental Improvements				

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12	LBC	The development will lead to a significant increase in the number of residents living at the property. This will result in increased trips to and from the site when compared to the existing situation. A Pedestrian, Cycling and Environmental Improvements contribution of £1,350,000 should be secured towards this scheme. This planning obligation would be secured by a section 106 agreement.	<p>The net quantum of pedestrian trips (also considering all trips to public transport services) as presented in the Transport Assessment are summarised below. As shown, a maximum of 326 additional two-way pedestrian trips are forecast during the PM peak.</p> <table border="1"> <thead> <tr> <th rowspan="2">Mode</th> <th colspan="3">AM Peak (08:00 – 09:00)</th> <th colspan="3">PM Peak (17:00 – 18:00)</th> </tr> <tr> <th>In</th> <th>Out</th> <th>Total</th> <th>In</th> <th>Out</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Bus/Coach</td> <td>26</td> <td>8</td> <td>34</td> <td>10</td> <td>26</td> <td>36</td> </tr> <tr> <td>National Rail</td> <td>60</td> <td>8</td> <td>67</td> <td>6</td> <td>61</td> <td>67</td> </tr> <tr> <td>London Underground</td> <td>92</td> <td>22</td> <td>114</td> <td>17</td> <td>99</td> <td>116</td> </tr> <tr> <td>Walk</td> <td>23</td> <td>50</td> <td>73</td> <td>60</td> <td>47</td> <td>107</td> </tr> <tr> <td>Total Pedestrian Trips</td> <td>201</td> <td>88</td> <td>288</td> <td>93</td> <td>233</td> <td>326</td> </tr> </tbody> </table> <p>Pedestrian surveys were commissioned by the Applicant and carried out independently by OnPoint Surveys Ltd on Tuesday 25th June 2019. The results are provided at Appendix D.</p> <p>The survey from the Grays Inn Road junction with Swinton Street shows there are 448 two-way north-south pedestrian movements on the eastern Grays Inn Road footway during the PM peak hour (17:00 – 18:00, Movement A + B). In accordance with TfL's Pedestrian Comfort Level (PCL) guidance (2019) and taking a minimum clear footway width of 2m, this equates to 3.7 pedestrians per metre per minute (ppmm) or PCL A.</p> <p>To provide a worst-case approximation, all additional pedestrian trips forecast to be generated by the proposed development have been assigned to this section of Grays Inn Road. This equates to a total of 774 two-way north-south pedestrian movements, or 6.5 ppmm resulting in PCL A-. This is well above the TfL standard requirement and demonstrates that the development will not have a detrimental impact to the surrounding pedestrian network. In addition, there are several routes from the development via Grays Inn Road, Wicklow Street, Swinton Street and Britannia Street as shown in Appendix E. Development trips will be more dispersed across this network than assumed in the analysis above, further reducing impacts on any one pedestrian link.</p> <p>The Transport Assessment shows that the development will generate 30 net additional cycling trips during the peak hours, an average of one every 2 minutes. This quantum of trips does not trigger the need for any specific mitigation.</p> <p>The only details of Pedestrian, Cycling and Environmental Improvements that have been shared with the Applicant are those relating to the Grays Inn Road Cycling, Walking & Road Safety Proposals which start from Harrison Street approximately 150m south of the site and continue to High Holborn. These improvements are currently being implemented.</p> <p>In relation to the requested financial contribution, it must be borne in mind that, as set out at Regulation 122 of the CIL Regulation 210 (as amended) and at paragraph 56 of the National Planning Policy Framework (2019), planning obligations must only be sought where they meet all of the following requirements:</p> <ul style="list-style-type: none"> • Necessary to make the development acceptable in planning terms; • Directly related to the development; and • Fairly and reasonably related in scale and kind. <p>It is considered that the infrastructure surrounding the site is generally of good quality and the analysis above has demonstrated minimal impact resulting from the proposed development. Accordingly, it is not considered that improvements are necessary and hence the first of the three planning tests is not met. In the absence of identifying specific shortfalls, it is difficult to pass the second test. The third test would only apply if there were a requirement for all similar developments to make contributions towards general improvements, in which case the size of any contribution could be expected to take into account the scale and relative access</p>	Mode	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)			In	Out	Total	In	Out	Total	Bus/Coach	26	8	34	10	26	36	National Rail	60	8	67	6	61	67	London Underground	92	22	114	17	99	116	Walk	23	50	73	60	47	107	Total Pedestrian Trips	201	88	288	93	233	326	
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			requirements of the Proposed Development. On this basis, a S106 contribution is not deemed appropriate. However, an allocation of CIL funding could be used and would be more appropriate in this instance.	
13	TfL	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.	As set out in item 12 above, these improvements are not considered relevant or necessary to make the development acceptable in planning terms. The proposed development will provide enhancements in the Gray's Inn Road frontage by providing increased footway width. The proposed building line is setback from the existing curtilage, striking a line between the adjacent Water Rats and the building on the corner of Britannia Street. Should the Ear Institute site be developed in the future, this will set an improved line for that site	
14	TfL	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.	As identified in the Transport Assessment, there is limited scope to deliver the minor improvements identified. As per item 12 above, the improvements identified are not necessary to make the development acceptable in planning terms or directly related to the development. The scheme is significantly enhancing permeability through the site between Wicklow Street, Swinton Street and Grays Inn Road via the new public realm. The west-east link from Gray's Inn Road to Wicklow Street will be managed by the Estate Security Team and open between dawn until dusk. The link from Swinton Street into the new public courtyard will also be managed by the Estate Security Team. The operational management of these routes are currently being agreed in the Heads of Terms and will be secured via s106.	
15	TfL	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.	As set out in item 12 above, carriageway changes are not considered necessary to mitigate the impacts of the development to make it acceptable in planning terms. As set out on page 45 of the submitted Public Realm Planning Report produced by East, it is intended that the new public realm will include a free drinking water fountain in the new Wicklow Yard public realm area. The potential for carriageway enhancements at the west end of Wicklow Street to provide a continuation of the granite setts to match existing, footway enhancements and potential for additional trees on Swinton Street are all recognised within the Design and Access Statement. These are not included within this planning application but follow the Team's aspiration for future public realm improvements.	
Infrastructure Protection				
16	TfL	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.	WSP undertook a Basement Impact Assessment (BIA) which was submitted with the planning application. This included assessment of load changes and a Ground Movement Assessment (GMA). LUL were contacted for preliminary information regarding their assets and historical drawings were provided. The BIA confirms that liaison with third party asset owners including LUL and Thames Water will continue in further developing the GMA to be updated during Stage 3 and 4 of the structural design post-consent.	
17	TfL	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.	The Swinton Street building does not have inset balconies facing Swinton Street; there are access decks which sit in board on the façade. The Wicklow Street building has corner inset balconies facing the railway cutting as shown on the planning layouts. The façade is over 3.1m back from the edge of the railway cutting, as demonstrated below.	

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Construction Logistics				
18		<p>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. 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.</p>	<p>Until a development Contractor has been appointed it is difficult to be specific with regard to development programming, construction methodology and impacts upon the operation of the TLRN. The Applicant is committed to working with TfL's Network Impact Management Team and its infrastructure Protection engineers in identifying specific impacts once a Contractor has been appointed and in developing the detailed CLP which will be secured by planning condition and submitted for approval by LBC and TfL prior to construction commencing on-site.</p>	

Appendix A

TfL pre-application response letter (24 April 2020)



Our ref: CMDN/20/28

Jack Williams
Steer
28 - 32 Upper Ground
London, SE1 9PD

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

By email only

Phone 020 7222 5600
www.tfl.gov.uk

24 April 2020

Dear Jack,

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

Please note that the following comments represent the views of Transport for London planning and technical officers in relation to strategic planning matters 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 also do not necessarily represent the views of the Greater London Authority.

I write in relation to our recent pre-application meeting regarding the proposals for a 202-room boutique hotel with restaurant, 14,000sqm offices, 1,000sqm gym and 80 residential units; all in separate blocks save for the gym which is in the basement. The site is currently occupied by The Royal National Throat, Nose and Ear Hospital, which as of October 2019 has started to be relocated to an alternative site.

A Transport Scoping note (TS) was received on 3 March 2020, followed by a presentation file just prior to the meeting. The emerging development proposals for this site were discussed at a GLA pre-application in May 2018. Rachel Yorke undertook extensive site investigations online as a physical site visit was rendered impossible by Coronavirus lockdown restrictions.

Attendees at the 2nd April 'Skype' meeting were:

Rachel Yorke, TfL Spatial Planning, Case Officer and Chair
Thomas Stone, TfL Public Transport Service Planning
Rob Edwards, TfL Lead Sponsor Network Planning
Shakirat Oklena, TfL, Sponsor for Transformation Schemes, Kings Cross
Ben Farrant, Planning Officer Camden Council
Stephen Burke, Camden Council
Jack Williams, Steer

Julie Bowerman, Steer
Alex Neal, Gerald Eve
Hyder Moshin, AHMM Architects

Site and Surroundings

The proposed development site includes a collection of buildings 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 National rail services accessed some 50m further north from King's Cross railway station. St Pancras national/international rail station is located just to the west of the latter. All stations benefit from step-free access.. 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.

Access

Vehicular access to the existing hospital is via Wicklow Street, and from Swinton Street. There is an additional crossover at one of the hospital entrances on Swinton Street.

Such accesses will be removed save for a newly-aligned access off Swinton Street into a proposed servicing area. A Stage 1 Road Safety Audit (RSA) should be completed at the planning stage for any proposed highway works.

All new entrances should provide an excellent arrival experience for people travelling on foot or by bike, and clearly prioritise pedestrians and cyclists over private vehicles. It was discussed at the meeting that a new pedestrian walkway through to Swinton Street will be stepped with a small lift for accessibility by wheelchair users to overcome level changes across the site. Future 24/7 hours of operation, retention and maintenance of the lift will need to be secured by legal agreement.

Healthy Streets and Vision Zero

The applicant's commitment to improving conditions for pedestrians and cyclists is encouraging and its Active Travel Zone (ATZ) exercise and map covers the appropriate key destinations and routes. While the scoping note refers to

'Healthy Streets', this should be expanded in the transport assessment (TA) to clearly demonstrate how the development proposal on its own delivers against the Healthy Streets criteria. Furthermore, where there are reductions in the score against various Healthy Streets criteria, measures to address these should be proposed. Once agreed between the respective authorities, improvements should be secured, either through section 106 or section 278 agreement as appropriate.

The development will deliver new pedestrian connections through the site, both north-south between Wicklow Street and Swinton Street, and east-west between Wicklow Street and Gray's Inn Road. These proposals to improve permeability throughout this area are strongly supported. Camden Council should seek to secure public access including for disabled persons (a lift has been proposed on the Swinton Street frontage to enable level access into this sloping site), and the minimum hours that they are to be available through the site via an appropriate mechanism. TfL's preference is for continuous access.

Further measures and enhancements to the public realm requested include changes to kerb-lines to widen footways as there is some poorly used space which could be reallocated without impact on network capacity. Free drinking water fountains should also be provided in areas of new public realm 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 also for Wicklow Street. There may be scope for York Stone paving and new trees.

TfL is seeking to improve conditions for all vulnerable road users in this area through its future proposals for the Kings Cross public realm and Gyratory system (both very much part of our existing business plans and funded schemes) and also by also lowering the speed limit to 20mph on the Inner Ring Road.

Roadspace: Future Plans

Many of the surrounding parking and loading restrictions are in place to serve the site's existing hospital use. For instance, there are ambulance bays on Swinton Street, Gray's Inn Road and Wicklow Street, and a number of Blue Badge holder accessible parking spaces surrounding the site. The proposal is to remove the now- redundant ambulance bays located on Gray's Inn Road, but re-distribute rather than remove the Blue badge bays. New provision of a small taxi rank in place of the ambulance bays on the main frontage may be prudent for the new proposed hotel and the existing hotel on the corner of Gray's Inn Road and Swinton Street; this should be explored further as trip generation derived from mode share analysis is progressed.

As stated above, TfL has been working on aspirations to enhance the Kings Cross Gyratory for a number of years in discussion with both Islington and Camden --- the latest proposals are based on enhancements to the existing gyratory rather than full gyratory removal. The project has the potential to significantly enhance this site's attractiveness, particularly for pedestrians. Modelling the impact of these changes is currently paused pending results from HS2. We will share further information when we can. However, depending on how well the timing aligns with the development of this site, a financial contribution towards realising these plans could be of mutual benefit and cost effective.

This approach relates also to the Camden Transport Strategy 2019-2041 which includes proposals to introduce a protected cycle lane further south on Gray's Inn Road. It is understood to provide segregated cycle tracks and protection through junctions. This requires the removal of parking and loading off main road with the latter moved to side roads. Gray's Inn Road is one of the top cycling locations in the London and therefore TfL supports the major contribution this scheme will make to safe cycling and its most recent check of the modelling indicates an acceptable level of bus impacts.

Retaining roadspace to maintain bus performance is a key priority for TfL. The A201 corridor is part of the Central London Bus Grid and construction in particular has generated performance issues, as set out below.

Parking – car and cycle

The proposal for a car-free development is welcomed in this highly accessible location. ITP London plan policy T6.5 (Non-residential disabled persons parking) states at least one disabled parking space should be provided on or off-street for workplaces, and a minimum of 3% of residential units thus provided. Accordingly, the development is proposing to provide between 5 and 6 disabled car parking bays, on-street near building entrances onto Wicklow and Swinton Streets respectively, re-purposing blue-badge spaces intended for hospital users. For clarification, TfL is *not* seeking additional space to provide blue badge parking for up to 10% of the units.

The scoping note refers to the potential for an on-street car club bay 'being explored' however this is not something TfL nor Camden Council are actively promoting in the Central London area. Rather, ensuring cycle hire provision in the area is sufficient to meet demand from new development is important. We expect that the use of the two nearby docking stations will increase with several large developments along GIR in the pipeline as well as the planned cycling infrastructure improvements. As the trip generation analysis is progressed it will become clearer whether additional docking points will be needed, to be funded by the developer.

Stacked long stay cycle parking will be located in the basement and will be secure, covered, lit and separated by land use. The quantities proposed accord with current policy standards (357 long-stay spaces and 30 short-stay spaces) but at this stage a sufficiently large lift to provide level access to storage for cyclists should be provided. TfL is otherwise unable to confirm whether cycle parking is in accordance with its London Cycle Design Standards 2104 because of lack of detail, however it does not support the proposal for all short-term (visitor) spaces to be on-street/TLRN. A good proportion should be provided on-site in the development's own public realm in convenient and easily-visible locations. Furthermore, showers, lockers and changing room space for employees' use should be indicated on-plan at submission stage, as well as a minimum 5% larger cycle spaces and some easy-to-use Sheffield-type stands to encourage bike use by all sectors of the population.

Trip Generation, Mode Share

In the AM and PM peak hours respectively, the proposed development will generate an additional 316 and 328 two-way total (all modes) people trips. The largest mode increase is in walking, with an additional 862 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, albeit servicing trips are calculated separately and may have been underestimated – more comments follow below.

Public Transport

According to net trip generation figures in Table 17, the development would generate a maximum of 28 bus trips in one direction in an hour. Bus stop N on Gray's Inn Road is served by routes 17, 46, 63, and 259 (and N63) with a total of approximately 28 buses per hour – so broadly 1 trip per bus. Based on this, and the proximity of the site to King's Cross Station and other bus routes on Euston Road, it is unlikely TfL will request any S106 bus route capacity contributions.

At the meeting TfL requested for the applicant to provide a distribution analysis across all underground lines at King's Cross station as well as the loading analysis the applicant has committed to. We should liaise over NUMBAT 2018 edition data; station planning standards will be supplied by TfL.

Infrastructure Protection.

As noted above, the site adjoins a London Underground (LU) cutting. The lines are laid relatively close to ground level and thus 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.

Currently there are balconies proposed parallel with the railway cutting at an as-yet unspecified distance. The applicant's attention is drawn to the Agent of Change Principle (Policy D12 of the ITPLP) which requires the developer to design their buildings, particularly residential uses which are sensitive to noise, to higher standards to avoid future noise complaints and protect existing transport operations.

In addition, the development includes a range of new uses at different floor levels on Swinton Street, close to existing bus stands. The design of these units should also reflect the agent of change principle as buses operate on a 24-hour basis in the area.

Servicing, construction and travel

A service yard will be provided adjacent to the proposed office element, located at ground level, accessed from Swinton Street. This service yard will be shared between the commercial uses, providing flexibility over the frequency of commercial collections and types of vehicle used. Commercial waste collections will be undertaken by private contractors for office, hotel and gym uses. The service yard will facilitate entry and exit in a forward gear up to a 10m rigid vehicle, albeit internal space appears quite tight. Swept path analysis for the service yard is provided which indicates there is adequate space left for buses to turn in and out of the bus stand opposite the yard entrance, noting the safety benefits too of this being a one-way street due to be changed from 30mph to 20mph. Nonetheless, as this is a new access/changed use an RSA should be undertaken as mentioned earlier, and no outward-opening bay doors will be permitted.

Servicing for the remaining residential land use is to be on-street from Swinton Street and Wicklow Street. TfL would usually resist new servicing on TLRN however, we recognise that there are already several on street ambulance bays and their removal would free up space. We also expect that servicing activity for the 80 residential units may be lower than former hospital trips. This should be confirmed in the transport assessment. That said, it would be difficult to stop drivers of vans/lorries generated by the other uses on this site and neighbouring ones seeking to use the on-street facility over the off-street one for convenience and expediency's sake. The applicant will need to provide a forecast of servicing trips other than that derived from their own database which is not in the public domain. The TA should detail the individual use classes (and dwell times if available)

TfL expects a detailed framework Servicing & Delivery Management Plan at submission stage that confirms there is Facilities Management onsite as mentioned at the meeting. To limit congestion on its TRLN and especially peak-time delays to buses, TfL urges Camden Council to exercise flexibility with the permitted servicing hours. This scheme should be serviced during night

time/early morning rather than the 8 am – 6pm/8am – 1pm hours generally imposed. Night time activity should be acceptable in this central London location. Further discussions with Camden Council may therefore be necessary.

Construction will need a greater level of detailing and programming than usual to protect the operation of TLRN, bus and rail infrastructure. TfL's Network Impact Management Team requires from this pre-application stage on, to work with the applicant to identify where there will be a specific impact (i.e. lane closures, loss of bus lanes etc). Developer funding/mitigation for the impacts will be sought through the s278 process in line with recent development. TfL has developed a process for calculating the costs of impacts on buses during construction, including through additional mileage, lost passenger revenue and lost advertising revenue.

The Construction Logistics Plan (CLP) should also seek to minimise the impact the development has on Cycle superhighway 6 which crosses Gray's 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 Gray's Inn Road.

A framework Travel Plan for all land uses should be submitted at application stage.

Community Infrastructure Levy (CIL)

The proposed development is within LB Camden, where the Mayoral MCIL2 charge is £80 per square metre Gross Internal Area (GIA) for most development and £185 per square metre for office, retail and hotel development.

I hope this provides a useful basis upon which to progress the preparation of the planning application and supporting TA and look forward to hearing from you shortly. If however you have any queries in the meanwhile, or seek clarification, please do not hesitate to contact either myself or Rachel Yorke.

Yours sincerely



Lucinda Turner

Director of Spatial Planning

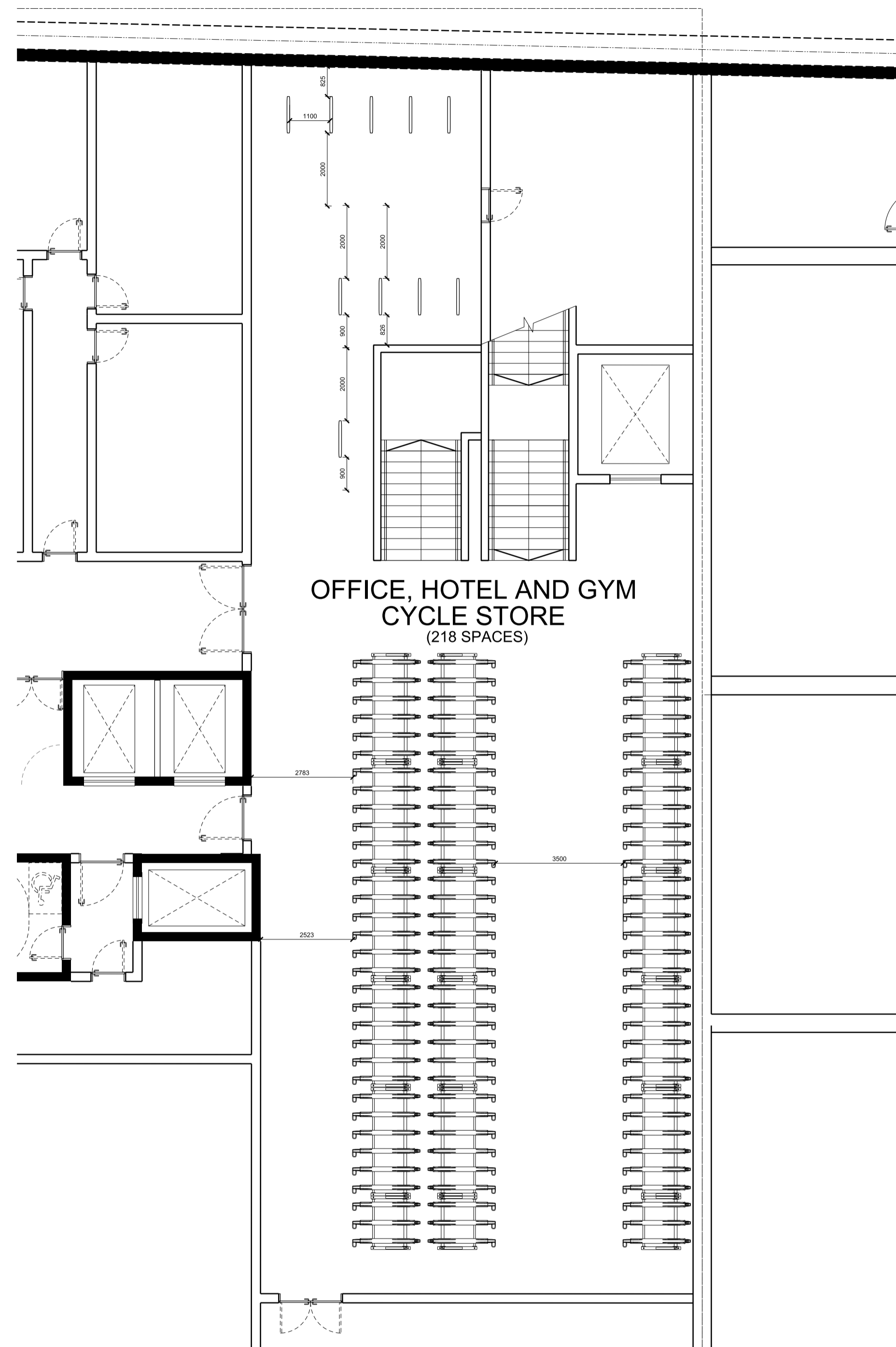
Email: lucindaturner@tfl.gov.uk

Direct line: 020 3054 7133

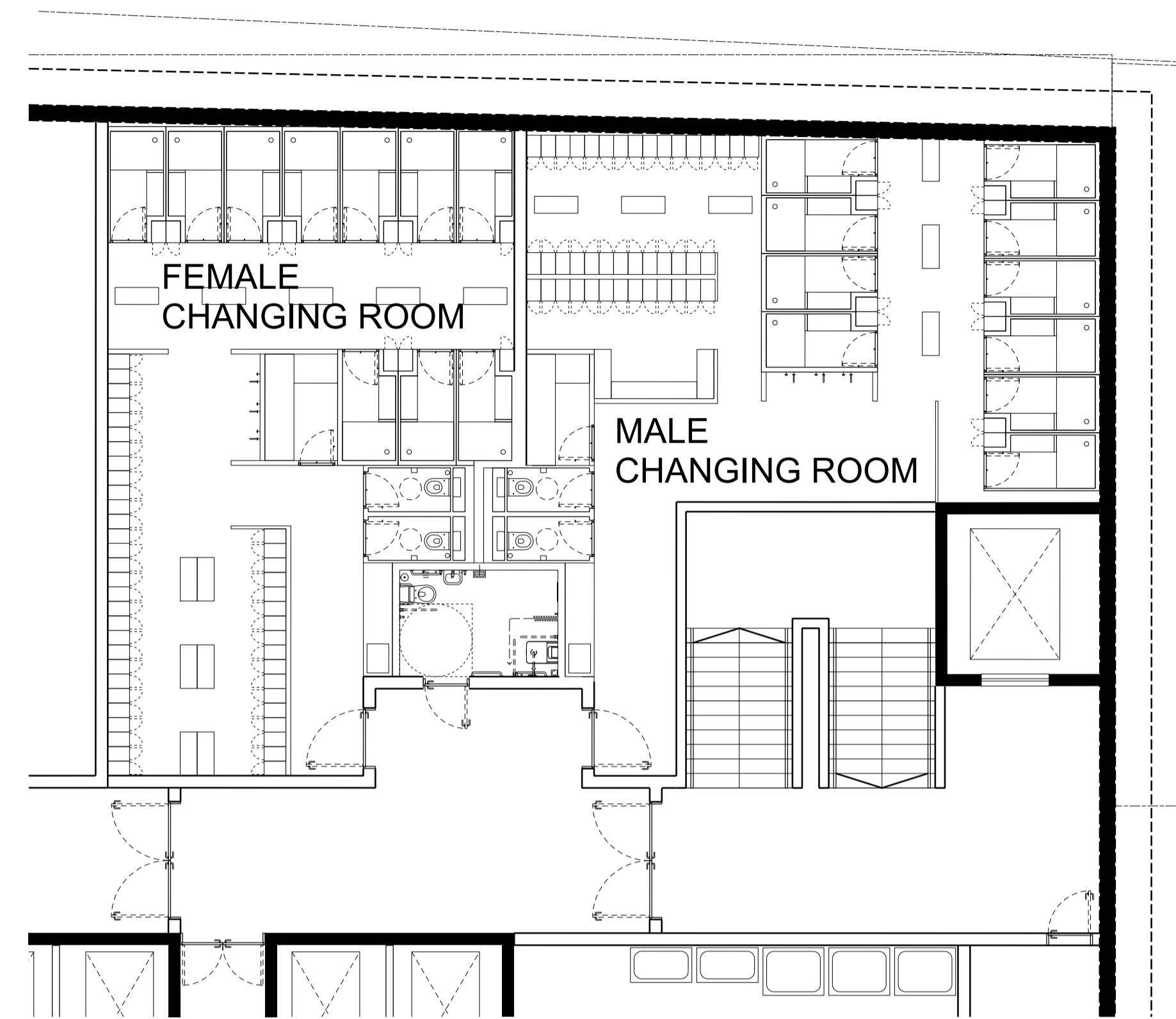
Copy to: All at meeting
GLA: Jonathan Finch

Appendix B

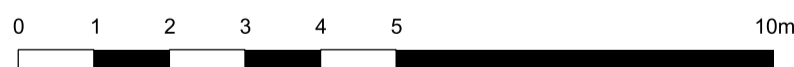
Indicative basement locker and shower layout



01 OFFICE, GYM AND HOTEL CYCLE STORE - LOWER GROUND



02 MALE AND FEMALE CHANGING ROOMS - BASEMENT

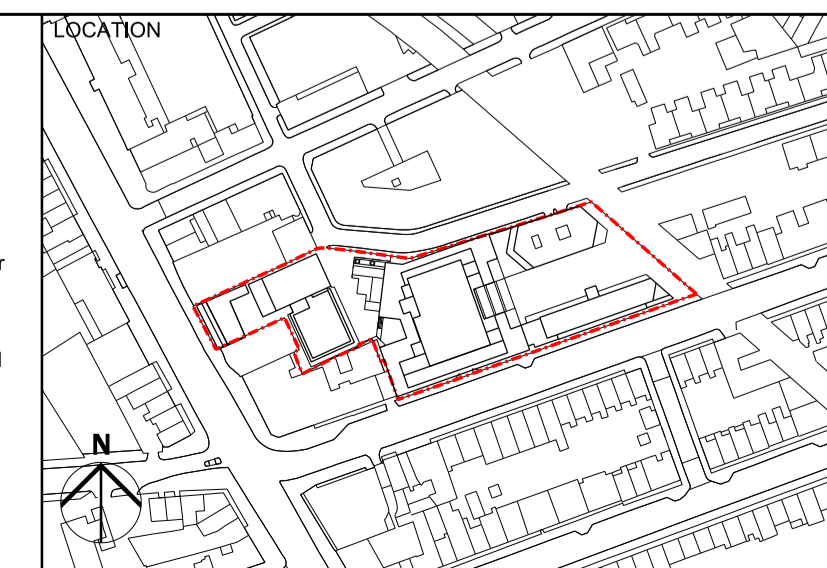


KEY	REV	DATE
	A	18/12/20 ISSUED FOR INFORMATION

CONSULTANTS	NAME
CLIENT:	GROVEWORLD
STRUCTURAL ENGINEER:	WSP
MECHANICAL ENGINEER:	XC02
COST CONSULTANT:	TURNER TOWNSEND
ACOUSTIC CONSULTANT:	HANN TUCKER
TRANSPORT CONSULTANT:	STEER
DAYLIGHT / SUNLIGHT:	POINT2

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job title 330 GRAYS INN ROAD			
drawing title / location PROPOSED CYCLE STORE AND CHANGING LOWER GROUND AND BASEMENT			
drawn by GS	checked MH	scale 1:100@A1; 1:200@A3	status INFORMATION
project 18116	zone 02	source classification A	drawing no. revision (00)_101 A

Appendix C

Public Realm Planning Report – Cycle parking extract



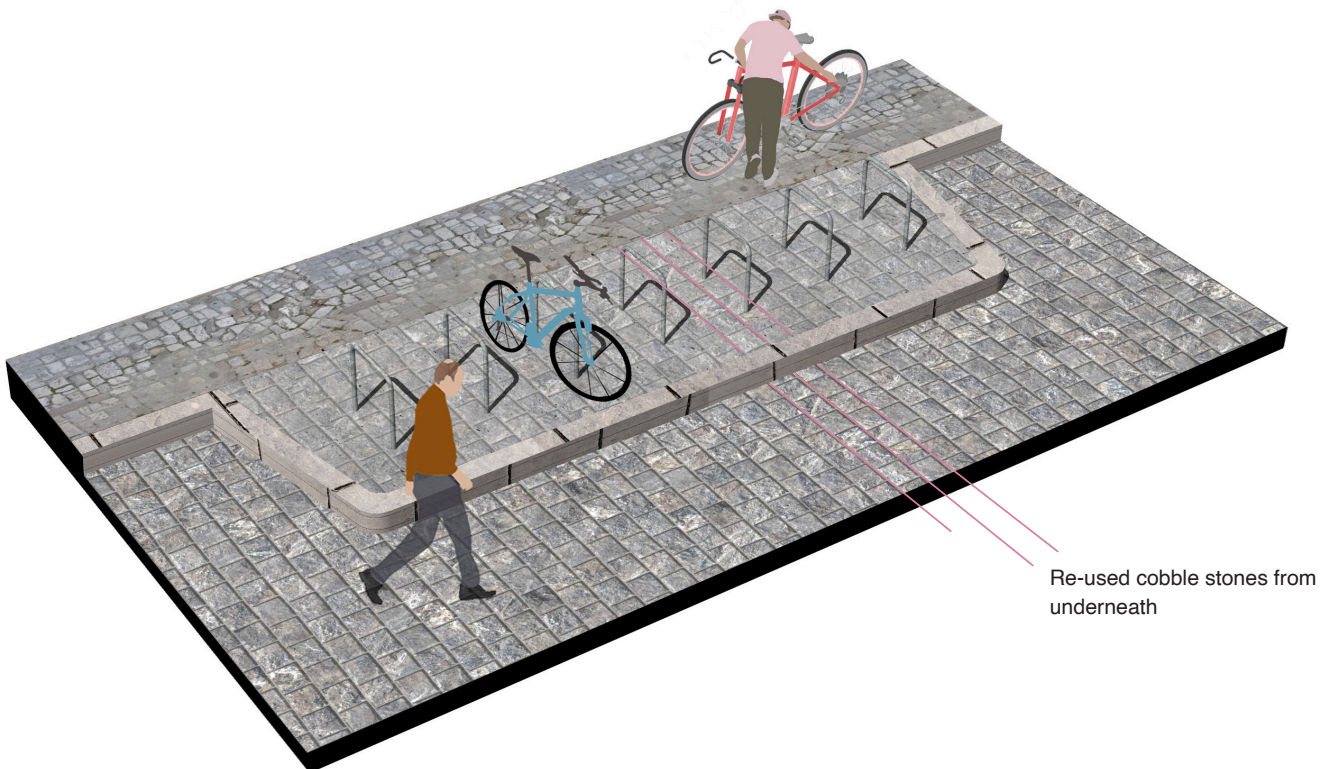
1



2



3



Re-used cobble stones from underneath

4

The on-site cycling strategy will provide at least 16 bike stands for short-stay around Wicklow Yard and 4 short-stay bike stands for the residential garden. Due to the density of the site some of those are proposed outside of the ownership boundary, though carefully designed to be non-invasive and respectful of the historic grounds beneath, such as the original granite setts of Wicklow Street.

In accordance with London Plan policy D7, it is intended that the new public realm will include a drinking water fountain in Wicklow Yard and in the Railway Garden. (Subject to post-Covid review)

1. Stainless steel cycle stands. Powder-coated cycles stands
2. Free standing rings on old cobblestones
3. New elements to be respectful of the historic grounds
4. Preferred option - New build-out using existing cobblestones and kerb stone

Appendix D

Pedestrian Survey





CLIENT: STEER GROUP

REF NUMBER: OPS06064

PROJECT DESCRIPTION: GRAYS INN ROAD - PEDESTRIAN SURVEY DATA

WEATHER: DRY/SUNNY

DATE: TUE 25TH JUNE 19

		MOVEMENT A	MOVEMENT B	MOVEMENT C	MOVEMENT D
07:00	: 07:15	10	13	11	16
07:15	: 07:30	7	14	8	19
07:30	: 07:45	12	29	18	22
07:45	: 08:00	19	38	14	17
TOTAL		48	94	51	74
08:00	: 08:15	21	48	34	20
08:15	: 08:30	16	57	43	30
08:30	: 08:45	39	84	49	36
08:45	: 09:00	19	107	52	38
TOTAL		95	296	178	124
09:00	: 09:15	33	97	51	32
09:15	: 09:30	19	87	47	50
09:30	: 09:45	26	80	53	29
09:45	: 10:00	30	57	49	26
TOTAL		108	321	200	137
PERIOD TOTAL		251	711	429	335
16:00	: 16:15	29	15	14	20
16:15	: 16:30	61	31	49	38
16:30	: 16:45	57	33	31	32
16:45	: 17:00	73	23	31	40
TOTAL		220	102	125	130
17:00	: 17:15	74	28	34	47
17:15	: 17:30	66	33	48	33
17:30	: 17:45	73	42	43	42
17:45	: 18:00	89	43	40	36
TOTAL		302	146	165	158
18:00	: 18:15	85	31	39	28
18:15	: 18:30	68	43	33	32
18:30	: 18:45	58	31	40	24
18:45	: 19:00	61	41	39	23
TOTAL		272	146	151	107
PERIOD TOTAL		794	394	441	395
DAILY TOTAL		1045	1105	870	730

Appendix E

Pedestrian Access Plan

