



Our ref: CMDN/20/68  
Your ref: 2020/5593/P

Jonathan McClue

Planning Department  
London Borough of Camden

*Jonathan.McClue@camden.gov.uk*  
*By email only*

12<sup>th</sup> April 2021

Dear Jonathan

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

Following receipt of a response dated March 2021 from the applicant to TfL's 11<sup>th</sup> February Initial (Stage 1) comments, I have the following further comments. Please note that these 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.

It is disappointing that the applicants have not revised their proposals or responded positively to many of TfL's Initial transport requests - particularly in regard to Highway/gyratory-related improvements in line with T4 Healthy Streets policy (point 11 in the embedded attachment). Their analysis has similarly rejected Camden's estimated £1,350,000 sum for a Pedestrian, Cycling and Environmental Improvements contribution. This is assumed to be for the Gray's Inn Road scheme to the south which, while important and well-developed, is understood not to adjoin this site. Given all trips would start with pedestrians on Grays Inn Road TRLN which TfL manages the scale and proportional impact of this development on TfL's network is greater than the applicant acknowledges. We consider that the gross figure for likely walk trips is over 5000 trips per day, derived from adding walking trips to Network Rail, LU and buses trips and in acknowledgement of the direct link to Kings Cross station and buses infrastructure.

TfL is still developing costings for its Highway/gyratory related improvements at the site and with more time it will develop this and its reasoning for a mitigation sum for Camden's and the applicant's consideration. If there is too little time in your consultation process for this, we would be prepared to discuss the securing of a feasibility/design study to help, as I wrote at Stage 1, the timely delivery of improvements.

TfL supports the Council in securing highway improvements which are necessary, proportional and consistent with mitigation secured from other major developments in the area.

TfL requested justification for the applicant's rejection of '24/7' access to the central public open space. Their response did not include this, but the Council has kindly shared a Met Police 'Secure by Design' response that supports (night-time) gating supported by a management plan. Consequently, TfL acknowledges the challenges associated with continuous access in this particular case and location and will not pursue its objection.

**Transport for London  
City Planning**

5 Endeavour Square,  
Westfield Avenue,  
Stratford E20 1JN  
Phone 020 7222 5600  
Fax 020 7126 4275  
[www.TfL.gov.uk](http://www.TfL.gov.uk)

Given the site's location adjacent to an LU cutting, TfL raised the importance of thorough liaison with TfL's Infrastructure Protection team; this *is* happening, and the applicant confirms it will further develop the Ground Movement Assessment and update it during Stage 3 and 4 of the structural design post-consent.

Following TfL's objection to the applicant's proposed new taxi bay on the busy GIR red route the applicant has suggested a drop-off bay on Gray's Inn Road with appropriate waiting restrictions. It is felt the development will have sufficient access to the existing loading bay outside the adjacent Water Rats venue for drop off/pick up etc and there seems little justification for a new bay of any kind at this location. In its previous comments, TfL suggested the now-redundant ambulance bays in this location be reallocated for pedestrians or to enhance bus/cycle facilities but it would be prepared to consider a single red line applied in place which would help support the new hotel's requirements given it is legal for Taxis and some private hire vehicles can stop to drop off and pick up passengers.

I hope this clarifies TfL's current views, should you have any queries please get in touch.

Regards

Rachel Yorke  
**Principal Planner - TfL Borough Planning**  
Email: rachelyorke@tfl.gov.uk

Cc: Areena Berktold, GLA Planning