



## **Planning Applications Sub-Committee**

### **ADDENDUM**

**Date: TUESDAY, 29 OCTOBER 2024**

**Time: 10.30 am**

**Venue: LIVERY HALL - GUILDHALL**

**5. 65 FLEET STREET, LONDON, EC4Y 1HT - \*AMENDED 25/10\***

Report of the Planning & Development Director.

**For Decision**  
(Pages 3 - 50)

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# Agenda Item 5

Planning Applications Sub Committee 29<sup>th</sup> October 2024 Addendum

Agenda Item 5 – 65 Fleet Street (24/00648/FULMAJ and 24/00649/LBC)

## 1. Clarification

For clarity, this agenda item concerns both the planning application reference 24/00648/FULMAJ and the listed building consent application reference 24/00649/LBC, which both relate to the proposed development at 65 Fleet Street as addressed in the report for this agenda item.

## 2. Cover sheet

Correction in row 2 to the (F1) proposed floor space figures and where referenced incorrectly as 1,503.68sqm in paras 15, 19, 104 and condition 69.

2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Public House (sui generis)	244.99	Public House (sui generis)	670.91
Student (sui generis)	0	Student (sui generis)	32,078.36	
Learning & non- residential institutions (F1)	0	Learning & non- residential institutions (F1)	<b><u>1,486.18</u></b>	
Retail	834.65	Retail	391.85	
Office	29,714.26	Office	0	
TOTAL	30,793.91	TOTAL	34,644.79	
		TOTAL UPLIFT:	3,850.88	

### 3. Cover Sheet

Correction to the superstructure retention figures in row 11. VOLUME OF RETAINED FABRIC. Clarification of elements included under 'superstructure' also added.

11. VOLUME OF RETAINED FABRIC	North block	South block
substructure	100%	100%
superstructure	<u>93 %</u>	<u>94 %</u>
Façade*	0%	0%

\*463m2 of stone cladding panel is proposed for deconstruction and reuse in new facade

### 4. Consultation and recommendation

#### Historic England Comments:

Additional detail provided of Historic England's consultee response:

(FULL)

We consider the proposed roof extension over the south building to cause a low level of harm to the significance of the Temples Conservation Area and the listed buildings within King's Bench Walk. In accordance with relevant policies, we would recommend that your authority seek to ensure that this harm is justified and reduced or minimised as far as possible.

In respect to the impact of the proposals on the ability to see the tower of St. Bride's Church in views from the Thames, we would recommend that the proposals seek to ensure there is no blocking or obscuring of the church spire in these views (for clarity, beyond the extent of any existing buildings or permitted schemes). The proposals have the potential to cause harm to the significance of the church through development within its setting and in our view, such harm should be avoided, bearing in mind that the church is a grade I heritage asset of the highest significance.

Recommendation: Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 205 and 208 of the NPPF.

Officer Response: The concerns raised by Historic England are addressed in Paragraphs 378, 391, 450 and 471.

### 5. Additional Comments

- Agent’s response to TFL comments dated 17<sup>th</sup> September 2024.
- NHS London Healthy Urban Development Unit comments dated 15<sup>th</sup> October 2024.
- An additional letter of support has been received from Oliver Sells dated 16<sup>th</sup> October 2024.

## 6. Amendments to Paragraphs

### Paragraph 470

Delete reference to objection by Historic England and Gardens Trust, insert concerns raised with regard to heritage impacts.

### Paragraph 669

Optioneering Assessment – Add the no. of bedrooms achieved for each option:

- Option 1 – **657 bedrooms**
- Option 2 – **777 bedrooms**
- Option 3 – **871 bedrooms**

Correction of the superstructure retention rates for Option 2 and Option 3.

Revised version:

<b>Retention rates</b>	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>
Substructure retained by mass	100%	100%	100%
Superstructure retained by mass ( <i>frame, upper floors, roof, stairs, ramps</i> )	North block 100% South block 100%	North block <b><u>98%</u></b> South block <b><u>100%</u></b>	North block <b><u>93%</u></b> South block <b><u>94%</u></b>
Superstructure retained by area ( <i>external walls, windows, ext. doors</i> )	0%	0%	0%

### Paragraph 673

Correction of the superstructure retention rates of the proposed development.

**93%** of the superstructure of the North Building and **94%** of the superstructure of the South Building would be reused including complete reuse of the substructure for both buildings.

### Paragraph 732

Delete reference to harm to the significance of a Conservation Area, insert harm to the setting of a Conservation Area.

Paragraph 745

City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£288,756.75	£274,318.91	£14,437.84
<b>City Planning Obligations</b>			
Local, Training, Skills and Job Brokerage	£115,502.70	£114,347.67	£1,155.03
Carbon Reduction Shortfall ( <i>as designed</i> ) <i>Not indexed</i>	£226,290.00	£226,290.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£5,750.00	£0	<b><u>£5,750.00</u></b>
<b>Total liability in accordance with the City of London's policies</b>	<b>£686,049.45</b>	<b>£664,956.58</b>	<b><u>£21,342.87</u></b>

The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- *Local Procurement Strategy*
- *Local Training, Skills and Job Brokerage Strategy (Demolition and Construction)*
- *Affordable Student Accommodation*
- *Student Management Plan*
- *Student Accommodation Nomination Agreement*
- *Remedial Highway Works*
- *Travel Plan*
- *Delivery and Servicing Management Plan*
- *Carbon Off-Setting Submissions*
- *Public Realm Management Plan*
- *'Be Seen' Energy Performance Monitoring*

- *Medieval Crypt, Archaeology and Heritage Implementation Strategy*
- *Cultural Space Implementation Strategy*
- *Cultural Space Management Plan*
- *Cultural Space Specification*
- *Medieval Crypt Management Plan*
- *Construction Monitoring Contribution (£30,935 for First Year and £25,760 for Subsequent Years)*
- *Section 278 Agreement*
- **NHS Contribution (£45,000)**
- **Cultural Space Contribution (£500,000)**

#### Paragraph 748

The scope of the s278 agreement may include, but is not limited to:

#### **Fleet Street**

- Resurfacing of the carriageway fronting the planning application site
- Reinstatement of footways as per the City of London's standard materials fronting the planning application site
- Removal/ Reinstatement of street furniture
- Reinstatement of road Markings and associated traffic orders
- Reinstatement of controlled crossing and associated road markings and infrastructure

#### **Bouverie Street**

- Resurfacing of the carriageway within the frontage of the site (if applicable)
- Reconstruction of footways as per the City of London's standard materials.
- Reinstatement/ Removal of redundant street furniture if applicable (removal and reinstatement) legible London
- Road Markings and associated traffic orders (if applicable)
- Provision of crossover for disabled access and accommodation works
- Reinstatement of TfL cycle hire

#### **Whitefriars Street**

- Reinstatement of the footway as per City of London's standard materials
- **Reconstruction of existing vehicular access to suit the new site layout**

#### **7. Update to conditions**

Condition 8 amended to specify design iterations for WLC assessment as follows:

Prior to the commencement of the development, excluding demolition of the development detailed Whole Life-Cycle Carbon assessment **covering two iterations**

**- a) as-approved design stage, b) Stage 4 design** - shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's Aspirational Benchmark set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.

Condition 29 amended to reflect correct UGF factor figure as follows:

Prior to implementation **of landscaping works**, details shall be submitted to and approved in writing by the local planning authority to demonstrate that opportunities have been explored to achieve a target of 0.4 urban greening factor and if not achievable provide a justification as to why a higher UGF could not be achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of **0.305** shall be maintained for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

Condition 30 amended to include reference to skylights as follows:

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- a. Particulars and samples of the materials to be used on all external faces of the building, including soffits and sample panels which demonstrate the appearance and relationship of the materials with each other;
- b. Construction of a 1:1 sample material and façade panels of agreed sections of the façade;
- c. Details of the proposed new façade including typical details and samples of the fenestration, entrances, balustrading and decorative elements at a scale of no less than 1:20;
- d. Detailed drawings of a scale no less than 1:20 in plan, section and elevation of agreed typical bays;
- e. Details of the proposed roof materials, dormers, **skylights** and parapet walls including samples of materials and details of junctions;
- f. Details of ground floor elevations including entrances, shopfronts, artwork and historical interpretation;



- g. Full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, and any infrastructure required;
- h. Full details of the integration of building cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- i. Full details of access to the roof for cleaning and maintenance, including details of mansafe equipment;
- j. Details of cleaning of retained historic facades, including methodology for the protection of decorative elements;
- k. Details of all external artwork and heritage interpretation; and
- l. Details of all external materials, including samples, within the archway including flooring, windows, shopfronts, soffits, doors and lighting.

REASON: To ensure the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2; DM10.1; DM10.5; DM12.2.

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BJC/CA/DP6834  
17 September 2024

**FAO: Emma Barral**  
**City of London**  
**Guildhall**  
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**EC2V 7HH**

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Dear Emma,

## **Applicants response to Transport for London (TfL) comments in relation to planning application 24/00648/FULMAJ**

On behalf of our client and applicant, Whitefriars Ltd., we write in relation to the consultation response from Transport for London (TfL) received in respect of the planning application at 65 Fleet Street, London, EC4Y 8BQ (ref. 24/00648/FULMAJ).

### **Background**

In June 2024, an application was submitted for the following proposed development (ref. 24/00648/FULMAJ)

*“Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.”*

Since the submission, the application has received a response from TfL dated 28 August 2024 which has been carefully reviewed by the Applicant. Their full comments have been appended to this response document and can be found in Appendix 1.

A summary of their comments are set out below:

- *“Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street*
- *Further information on the design of the cycle parking, including lift dimensions.*



- A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.
- Stage 1 Road Safety Audit (RSA) and Designer’s Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.
- Further clarity is needed on the relationship between public and private space within the site.
- We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.
- TfL must be consulted on discharge of the Student Move In Move Out Strategy.
- The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.
- We request a PCL assessment of crossings at the junction of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.
- We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street.
- Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.
- The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.”

Upon receipt of these comments the Transport Consultant Pell Fischmann has prepared a response document which is also appended to this cover letter and can be found in Appendix 2. Within this document they set out a response to the comments made by TfL.

A response table below has been prepared which provides a response to TfL comments from DP9, Mcaleer Rushe (MAR), ECE Westworks as well as highlighting where a response can be found from Pell Frischmann document.

TfL Comment	Response from applicant team
Throughout the construction there is a narrow gantry designed to enable pedestrian movement on the footway along Fleet Street, with a pitlane along Fleet Street meeting the junction adjacent to the site and Whitefriars Street. If a gantry must be retained for construction at this site, we request installation of a wider gantry with improved lighting, as the current arrangement is narrow and dark even in daylight, which is not sufficiently inclusive.	To confirm this gantry will be 2.55m on the footpath to ease pedestrian traffic. It will also be kept open, not closed, and well-lit under the gantry.
There is an existing courtyard within the site connecting Bouverie Street and Whitefriars Street, which will be retained, TfL request clarity on the status of this access point. We also request whether the access will be 24/7 access in line with Policy D8 and the Public London Charter.	This matter is pursuant to separate discussions with the City.
TfL request that new access points for the site should improve current natural surveillance and street lighting. The main access for the student accommodation will be on Bouverie Street.	The current proposals are a fundamental improvement to the existing condition, particularly on Fleet Street. The passage is now a much better proportioned continuous space



TfL Comment	Response from applicant team
<p>Given the access is off the main road network at Fleet Street, safety for the students should be prioritized and carefully considered.</p>	<p>with many seats, borrowed light from adjacent shops and communal spaces any niches are very well lit. in Appendix 3 you can find the MBLD Lighting Proposals. Moreover, gates are also proposed and shown on all elevation and passage drawings, which will be access controlled out of hours.</p>
<p>Cyclists would access the site via Whitefriars Street providing access to basement level cycle parking using the existing servicing ramp. As well as the ramp, a cycle lift is proposed which is described as for disabled cyclists to use. The lift should be match minimum dimensions specified in the London Cycle Design Standards (LCDS), specifically 1.2 by 2.3 metres, with a minimum door opening of 1000mm. For further guidance see: <a href="https://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf">https://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf</a></p>	<p>Please refer to Pell Frischmann document paragraph 3.1.1 (section 3.1).</p>
<p>Given that student accommodation is the primary use proposed for the site, further analysis is needed to show how the relationship from the site to local Cycleways will be improved, as required by London Plan policy T5. Specifically S278 works should include the entire link route from the site to Cycleway 6 at New Bridge Street,190m away, all of which must be assessed against and if necessary improved to comply with the Cycle Route Quality Criteria.</p>	<p>Please refer to Pell Frischmann document paragraph 3.1.3 and 3.1.4 (section 3.1).</p>
<p>Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points.</p>	<p>Please refer to Pell Frischmann document paragraph 3.1.4 (section 3.1).</p>
<p>Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points.</p>	<p>Please refer to Pell Frischmann document paragraph 3.2.5 (section 3.1).</p>
<p>TfL now requires a 'night-time/dark hours' ATZ assessment is submitted to gain a true assessment of the walking environment paying particular attention to Healthy Streets criteria 'People feel Safe'. TfL</p>	<p>Please refer to Pell Frischmann document paragraph 4.1.1 (section 4).</p>
<p>TfL request further clarification to demonstrate the relationship between the public and private spaces and how the function and hierarchy of</p>	<p>Please refer to Pell Frischmann document paragraph 5.1.4 (section 5).</p>



TfL Comment	Response from applicant team
<p>the public realm could integrate with the land use and building blocks.</p>	
<p>We have safety concerns about the path proposed between Ashentree Court and Magpie Alley, which is poorly lit. This space needs further design attention to ensure it is safe, with appropriate street furniture and security management in place.</p>	<p>Magpie Alley sits outside of the site boundary and therefore not in the client ownership and control. Therefore it is not possible for works to be done there. It would be possible to apply additional building mounted lighting to the outside of the fleet street building to improve illumination. The current proposals will also increase the footfall in the area and therefore improve the existing conditions, within appendix 3 there is also the attached MBLD lighting proposals.</p> <p>There is the opportunity for a condition to be included on the decision notice for an external lighting scheme. However, these would not add illumination to the tunnel portion of the alley.</p>
<p>The development also needs a clear wayfinding system at key access points in the public realm to lead people to local destinations. We would be happy to support provision of Legible London signage within the site, subject to applicant funding</p>	<p>There is the opportunity to agree to a wayfinding strategy by condition in relation to the cultural uses on the site.</p> <p>A legible London Signage Strategy is not needed for this development.</p>
<p>Delivery and servicing trips appear to have been severely underestimated for the student accommodation proposed and overestimated for the other uses. This should be addressed. The projection of 28 deliveries per day for over 900 student accommodation units is completely unrealistic.</p>	<p>Please refer to Pell Frischmann document Section 6.</p>
<p>The mode share of just 6% for cycling is also too low for a car free site in the City of London. This should be increased to make the analysis robust and enable negotiation and agreement of suitable mitigation. The site is well connected to cycleways (C6 on New Bridge Street) and will have the maximum provision of long stay parking, which can cater for a mode share of at least 19%.</p>	<p>Please refer to Pell Frischmann document paragraph 6.1.7 (section 6).</p>
<p>We request the applicant conducts a PCL assessment as walking is projected to make up 59% of trips and given the proposed land use for the site will be a favourable mode of travel. This should include full assessment of the crossings at the junctions of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, and Bouverie Street / Tudor Street. Ludgate Circus should also</p>	<p>Please refer to Pell Frischmann document Section 7.</p>



TfL Comment	Response from applicant team
<p>be assessed as it is on the main route to City Thameslink Station.</p>	
<p>The TA details that an under provision of short stay for the non-student accommodation short stay could be provided through expanding the current cycle parking facilities on Bouverie Street.</p> <p>Given the nature of the site, we request a contribution of £100,000 to increasing capacity of the existing docking station, to support and promote active travel to and from the site.</p>	<p>Please refer to Pell Frischmann document Section 8.</p>
<p>TfL welcome that the blue badge space will have an Electric Vehicle Charging Point (EVCP) from the outset and request for a Parking Design and Management Plan, in line with London Plan Policy T6 to identify where additional blue badge spaces could be provided if demand exceeds current requirements.</p>	<p>Please refer to Pell Frischmann document Section 8.</p>
<p>TfL would be supportive of a high percentage of deliveries being consolidated prior to entering the site, to reduce the number of deliveries and be more sustainable.</p> <p>Provision should be made to accommodate and encourage cargo bike access via Bouverie Street (the main entrance for the student accommodation). We request cycle parking stands for these types of deliveries, to prevent any blocking of vehicles / pedestrians on Bouverie Street.</p>	<p>Please refer to Pell Frischmann document Section 9.</p>
<p>A framework Travel Plan has been submitted with the TA this includes a student and staff mode split. As mentioned above the 6% expected baseline mode share for cycling is unacceptable, and the Travel Plan target to increase cycling by occupants by only 4% to 10% over five years is also insufficiently ambitious and must be increased.</p>	<p>Please refer to Pell Frischmann document Section 10.</p>
<p>We strongly encourage the City to consider securing funding for Cycle Hire memberships as part of the planning obligations for this development.</p>	<p>Please refer to Pell Frischmann document Section 8.</p>
<p>A booking system is proposed to be implemented for the site whereby cars will be parked on a stretch of 75 metres of Bouverie Street, where a single yellow line permits loading and unloading for up to 40 minutes. The students will be contacted prior to arrival to provide detail of their travel arrangements, enabling a time slot to be booked if arriving by car.</p>	<p>Please refer to Pell Frischmann document Section 11.</p>



TfL Comment	Response from applicant team
<p>We are very concerned about the proposed arrangement due to bus operations and request that staff ensure no queuing and parking on Fleet Street. If cars arrive early they must leave the area and return at their appointed time.</p>	
<p>The current Construction Logistics Plan (CLP) sets out indicative Traffic Management plan layout for Fleet Street during site construction, the final CLP should be secured by condition. The indicative Programme Timescale indicated has an overlap with the neighbouring Salsbury Square development, due for completion in early 2027. The applicant should therefore work in collaboration with the developers of this site to streamline access and reduce collective highway network impact.</p>	<p>In response to this MAR have confirmed that they have engaged with the Salisbury Square team since February 2024 to develop their strategy with the surrounding network and neighbours in mind.</p>
<p>The applicant should aim to mirror the existing pit lane width and operation at a 3.2m width, rather than using a wider pitlane of 3.6 metres</p>	<p>MAR have confirmed that the additional width on Fleet Street is to facilitate a safe wing in and out onto the main road, and is also the same width as the MACE pit lane in the same lane.</p>
<p>The applicant should look at off-site holding area locations that could be utilised to avoid a situation where there is delay for vehicles accessing the pit lane, that may block the nearby pedestrian crossing and cause traffic queuing.</p>	<p>In response it has been confirmed that while there are no off-site holding areas within the City of London, their supply chain will utilise their yards to hold materials and our booking system to ensure there is no queue of vehicles outside our boundary.</p>
<p>The applicant should coordinate with TfL and the City of London to ensure that suitable provisions, such as optimised signal timings further along Fleet Street, can be made to accommodate the loss of the pedestrian crossing in the immediate vicinity of the site during the works.</p>	<p>MAR note the comment, they have already confirmed removing the signals is acceptable with the TFL principle planning team but can seek further input for suitable provisions. MAR believe this detail is required at condition discharge, please confirm.</p>
<p>TfL should be consulted once a contractor has been appointed the finalised pit lane layout emerges, as Fleet Street is on the Strategic Road Network (SRN). This includes detailing any changes to existing road widths and demonstrating that access to the adjacent bus stop Fleet Street (Stop 8570, Fetter Lane) will be safely maintained for both buses and pedestrians, which should be demonstrated showing a swept path of an electric bus stopping at this location.</p> <p>For the new wider pitlane being proposed, as a worst case scenario, TfL request swept paths of two electric buses passing each other.</p>	<p>In response to this MAR have confirmed that this is noted, and the requested swept paths can be demonstrated on Fleet St. MAR believe this detail to be required at condition discharge, please confirm.</p>
<p>The indicative pit lane layout shows a potential user conflict at the kerb of Whitefriars Road and Fleet Street when Articulated Vehicles enter the</p>	<p>MAR note this and specific details of TM's will be shown for every vehicle movement in the</p>





TfL Comment	Response from applicant team
pit lane. Marshal locations should therefore clearly be demonstrated in the final Traffic Management Plans.	TMP.MAR believe this detail to be required at condition discharge, please confirm.
The CLP shows Route 2 involves exiting off Fleet Street onto Bouverie Street leading to Tudor Street and onto New Bridge Street, located south of the site. We have strong concerns on this proposed routing as it uses an uncontrolled road and a give way across Cycleway 6 to give way onto New Bridge street. We would not support any construction access via this route during weekday tidal cycling peaks.	MAR have confirmed that this vehicle route is as per the Salisbury Square site. The amount of traffic is also alleviated by the use of Route 1 towards Blackfriars Upas.

We trust the above provides a response to each point raised by Transport for London, should you however any further comments or questions please do not hesitate to contact Barnaby Collins or Charlotte Allen of this office.

Yours faithfully

**DP9 Ltd.**



Your ref: 24/00648/FULMAJ

Our ref: CITY/24/34

Emma Barral

Development Management, City of London Corporation

By email only to: [REDACTED]

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**RE: 24/00648/FULMAJ, 65 Fleet Street, City of London, EC4Y 1HT**

Thank you for consulting TfL with regard to this planning application reference 23/01102/FULMAJ.

## **Site Location**

The site of the proposed development is located on Fleet Street which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also bound by Whitefriars Street to the east and Bouverie Street to the west and Tudor Street to the south, all forming part of the City of London road network.

Bouverie Street operates a one-way system southbound off Fleet Street and Whitefriars Street operates one way north bound onto Fleet Street with the exception of cyclists both ways.

The site is also located approximately 190m west of the A201, New Bridge Street which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

The nearest bus stop is located on Fleet Street adjacent to the site named Fetter Lane, serving routes 15, 17, 26, 40, 63, 76, 341, N15, N21, N26, N63, N89, N199, N550, N551.

The closest station to the site is also Liverpool Street which serves the Central, Circle, Hammersmith & City, Metropolitan and Elizabeth Lines as well as Overground and National Rail services.

The site has a Public Transport Access Level (PTAL) of 6b on a scale from 0 to 6b where 0 is the lowest and 6b is the highest, therefore the site rank is excellent in terms of accessibility.

Cycleway 6 is located on New Bridge Street, 190m from the site, connecting Elephant and Castle to Hampstead.

The nearest station is City Thames Link approximately 285 metres east of the site along Fleet Street. The nearest London Underground station is Blackfriars at approximately 430 metres southeast and Temple station approximately 700 south west, both serving the District Line, Circle Line and Blackfriars also serving national rail.

The nearest cycle hire docking station is Bouverie Street directly outside of the site.

### **Neighbouring sites**

It should be noted that there is a consented application for 'Land bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street'.

This site secured the closure of Shoe Lane (Stop H) bus stop located on Fleet Street directly outside of the site and has been relocated and secured via S278 agreement with TfL.

Throughout the construction there is a narrow gantry designed to enable pedestrian movement on the footway along Fleet Street, with a pitlane along Fleet Street meeting the junction adjacent to the site and Whitefriars Street. If a gantry must be retained for construction at this site, we request installation of a wider gantry with improved lighting, as the current arrangement is narrow and dark even in daylight, which is not sufficiently inclusive.

### **Consented scheme**

A previously consented planning application (Planning ref. 19/00058/FULMAJ) was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses at lower ground floor level.

The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area.

The existing public house is to be retained in the new application, whereas the previously consented application proposed to remove it.

### **Site access**

#### *Pedestrian access*

There is an existing courtyard within the site connecting Bouverie Street and Whitefriars Street, which will be retained, TfL request clarity on the status of this access point. We also request whether the access will be 24/7 access in line with Policy D8 and the Public London Charter.

TfL request that new access points for the site should improve current natural surveillance and street lighting. The main access for the student accommodation will be on Bouverie Street. Given the access is off the main road network at Fleet Street, safety for the students should be prioritized and carefully considered.

#### *Cycle access*

Cyclists would access the site via Whitefriars Street providing access to basement level cycle parking using the existing servicing ramp. As well as the ramp, a cycle lift

is proposed which is described as for disabled cyclists to use. The lift should be match minimum dimensions specified in the London Cycle Design Standards (LCDS), specifically 1.2 by 2.3 metres, with a minimum door opening of 1000mm. For further guidance see: <https://content.tfl.gov.uk/lclds-chapter8-cycleparking.pdf>

Given that student accommodation is the primary use proposed for the site, further analysis is needed to show how the relationship from the site to local Cycleways will be improved, as required by London Plan policy T5. Specifically S278 works should include the entire link route from the site to Cycleway 6 at New Bridge Street, 190m away, all of which must be assessed against and if necessary improved to comply with the Cycle Route Quality Criteria (<https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>) This can identify any works required to link routes in the local highway network to stitch the development into local and London-wide cycling networks.

Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points. This is necessary to ensure compliance with London Plan policies T2 and D8. Specific enhancements should be secured to ensure delivery by section 278 (S278) agreement or section 106 (S106) contribution to Corporation-delivered local highway works.

### **RSA and Healthy Streets Check for Designers**

The Mayor's Healthy Streets and Vision Zero approaches are essential to delivering good growth in London and increasing travel by walking, cycling and public transport, as required by London Plan policies GG3, T1, T2 and others.

TfL expects all streets and public realm within and around the site to be designed in line with these approaches to help achieve the outcomes of the Mayor's Transport Strategy (MTS), which is also explicitly referenced in London Plan policy.

Considering this, we recommend that the proposed highway works are designed up in further detail to enable a Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers prior to determination.

These assessments should be audited and approved by TfL and the City Corporation's transport team before they are considered valid and considered by relevant planning decision makers at the City.

### **Active Travel Zone Assessment (ATZ)**

The ATZ includes a day time assessment which is welcomed by TfL however, since the previously consented application, TfL now requires a 'night-time/dark hours' ATZ assessment is submitted to gain a true assessment of the walking environment paying particular attention to Healthy Streets criteria 'People feel Safe'. TfL is committed to improving women's safety, and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. For information on the issue, TfL also recommends the newly published GLA guidance: Safety in Public Space; Women, Girls and Gender Diverse People.

The daytime ATZ has been completed between 9:30-10:30 AM, assessing four routes, destination in order of route being; City Thameslink Station, LSE University Library, Chancery Lane Underground Station, Blackfriars Underground Railway Station.

To summarise the ATZ assessment, no improvements were suggested for Route 1. Route 2 identified an area of footway on Carey Street where tactile paving needs to be added. Route 3 identified the worst section being the footway prior to the Rolls Building / Fetter Lane crossing, due to Lime Bikes presence reducing the footway, which could negatively impact pedestrians who require a wider pavement such as those with pushchairs and wheelchairs. Route 4 also requires some tactile paving on the crossing at the south section of Whitefriars Street, as well as the repainting of cycle lanes to stop cyclist confusion, which is especially required given this street is where the long stay cycle parking is proposed to be accessed.

A Vision Zero analysis has been provided which confirms there have been no fatal collisions across 2020-2022 along local ATZ routes assessed, but two collision clusters of multiple serious injuries.

The first is at the crossing at the eastern end of Fleet Street, part of journey one, and the second at the crossing at the eastern end of Tudor Street, part of journey four. We therefore recommend requests the applicant engages with the City of London as the highway authority to agree highway safety improvements at these locations, meaning specific appropriate works and sufficient applicant funding.

### **Public Realm and placemaking**

TfL request further clarification to demonstrate the relationship between the public and private spaces and how the function and hierarchy of the public realm could integrate with the land use and building blocks.

The site should operate in line with London Plan policy D8 and the Public London Charter, which highlights that all public and semi-public spaces in London should be safe, accessible, inclusive, attractive, well-connected, and easy to understand – even if privately managed, they should read as public spaces and be subject to the same rules.

We have safety concerns about the path proposed between Ashentree Court and Magpie Alley, which is poorly lit. This space needs further design attention to ensure it is safe, with appropriate street furniture and security management in place, in line with the Healthy Streets principles and policies T2 and D8 of the London Plan.

The development also needs a clear wayfinding system at key access points in the public realm to lead people to local destinations. We would be happy to support provision of Legible London signage within the site, subject to applicant funding. The City may wish to secure a wayfinding signage scheme by condition or another appropriate planning obligation, with future costing, design and delivery by TfL, prior to occupation.

### **Trip Generation**

A multi-modal trip generation has been undertaken to assess and quantify the potential impact of the proposed development in terms of the number of trips expected to be generated by the development.

The report claims a reduction in trips, thus no impact. However, the development will clearly result in an increase in trips between 19:00 – 24:00, given the proposed change from office to student accommodation. There may also be an increase in public transport trips away from the development at AM peak hours.

Overall the site is expected to generate a total of 3176 two way trips including 1808 pedestrian and 1053 trips London Underground (LU) and National Rail trips. The application argues this is expected to be 3412 fewer daily trips than the site's existing land use.

Delivery and servicing trips appear to have been severely underestimated for the student accommodation proposed and overestimated for the other uses. This should be addressed. The projection of 28 deliveries per day for over 900 student accommodation units is completely unrealistic.

The mode share of just 6% for cycling is also too low for a car free site in the City of London. This should be increased to make the analysis robust and enable negotiation and agreement of suitable mitigation. The site is well connected to cycleways (C6 on New Bridge Street) and will have the maximum provision of long stay parking, which can cater for a mode share of at least 19%.

### **Pedestrian Comfort Levels (PCLs)**

We request the applicant conducts a PCL assessment as walking is projected to make up 59% of trips and given the proposed land use for the site will be a favourable mode of travel. This should include full assessment of the crossings at the junctions of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, and Bouverie Street / Tudor Street.

Ludgate Circus should also be assessed as it is on the main route to City Thameslink Station. Please see the attached link for further information <https://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>

### **Cycle Parking**

The cycle parking proposed would comply with London Plan Policy T5, whereby there are to be 653 long stay spaces for the student accommodation and six for the other site uses. 22 short stay spaces are proposed for the student accommodation which also meets London Plan standards.

For the other uses 26 short stay spaces are proposed for the non food retail / gallery use and 26 for the retained public house. This is also supported

The TA details that 5% of all cycle parking will be provided as Sheffield stands to accommodate for larger / adapted cycles, in line with LCDS.

The cycle parking should be secured by condition and discharged in consultation with TfL. Details on bay width, access aisle width and spacing between stands should be provided, to confirm compliance with the standards in figure 8.1 of the London Cycling Design Standards (LCDS).

### **Cycle hire**

The TA details that an under provision of short stay for the non-student accommodation short stay could be provided through expanding the current cycle parking facilities on Bouverie Street.

Given the nature of the site, we request a contribution of £100,000 to increasing capacity of the existing docking station, to support and promote active travel to and from the site.

### **Car parking**

Given the site has the highest PTAL of 6b, TfL welcome that the site is car free. The site is proposed to have one blue badge parking space located off Bouverie Street. Despite proposed access by reversing in, subject to local highway authority support on balance this is acceptable.

TfL welcome that the blue badge space will have an Electric Vehicle Charging Point (EVCP) from the outset and request for a Parking Design and Management Plan, in line with London Plan Policy T6 to identify where additional blue badge spaces could be provided if demand exceeds current requirements.

### **Delivery and Servicing**

A draft Delivery and Servicing Management Plan (DSP) has been submitted with the documents. The final DSP should be secured by condition.

The existing basement servicing yard can only accommodate small vans no larger than 4.5t. Therefore, proposals detail that on street provision is required on Whitefriars Street.

TfL highlight that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.

In conclusion it was identified that Option 1 (reversing) was considered the most viable, TfL do not accept reversing off the TLRN or SRN, however given access is proposed from a City of London road, this is a matter for the local highway authority.

TfL would be supportive of a high percentage of deliveries being consolidated prior to entering the site, to reduce the number of deliveries and be more sustainable.

Provision should be made to accommodate and encourage cargo bike access via Bouverie Street (the main entrance for the student accommodation). We request cycle parking stands for these types of deliveries, to prevent any blocking of vehicles / pedestrians on Bouverie Street.

### **Travel plan**

A framework Travel Plan has been submitted with the TA this includes a student and staff mode split. As mentioned above the 6% expected baseline mode share for cycling is unacceptable, and the Travel Plan target to increase cycling by occupants by only 4% to 10% over five years is also insufficiently ambitious and must be increased.

We strongly encourage the City to consider securing funding for Cycle Hire memberships as part of the planning obligations for this development.

The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement. We also recommend that the applicant provides a staff travel plan for construction of the development.

### **Student move in and out strategy**

A Student Move In / Out Strategy is to be prepared and we request to review the final plans once finalised. TfL should be consulted on discharge if this is secured by a separate condition to the DS and Travel Plans.

A booking system is proposed to be implemented for the site whereby cars will be parked on a stretch of 75 metres of Bouverie Street, where a single yellow line permits loading and unloading for up to 40 minutes. The students will be contacted prior to arrival to provide detail of their travel arrangements, enabling a time slot to be booked if arriving by car.

We are very concerned about the proposed arrangement due to bus operations and request that staff ensure no queuing and parking on Fleet Street. If cars arrive early they must leave the area and return at their appointed time.

### **Construction Management**

The current Construction Logistics Plan (CLP) sets out indicative Traffic Management plan layout for Fleet Street during site construction, the final CLP should be secured by condition.

The indicative Programme Timescale indicated has an overlap with the neighbouring Salsbury Square development, due for completion in early 2027. The applicant should therefore work in collaboration with the developers of this site to streamline access and reduce collective highway network impact. The applicant should aim to mirror the existing pit lane width and operation at a 3.2m width, rather than using a wider pitlane of 3.6 metres.

The applicant should look at off-site holding area locations that could be utilised to avoid a situation where there is delay for vehicles accessing the pit lane, that may block the nearby pedestrian crossing and cause traffic queuing.



The applicant should coordinate with TfL and the City of London to ensure that suitable provisions, such as optimised signal timings further along Fleet Street, can be made to accommodate the loss of the pedestrian crossing in the immediate vicinity of the site during the works.

TfL should be consulted once a contractor has been appointed the finalised pit lane layout emerges, as Fleet Street is on the Strategic Road Network (SRN). This includes detailing any changes to existing road widths and demonstrating that access to the adjacent bus stop Fleet Street (Stop 8570, Fetter Lane) will be safely maintained for both buses and pedestrians, which should be demonstrated showing a swept path of an electric bus stopping at this location.

For the new wider pitlane being proposed, as a worst case scenario, TfL request swept paths of two electric buses passing each other.

The indicative pit lane layout shows a potential user conflict at the kerb of Whitefriars Road and Fleet Street when Articulated Vehicles enter the pit lane. Marshal locations should therefore clearly be demonstrated in the final Traffic Management Plans.

The CLP shows Route 2 involves exiting off Fleet Street onto Bouverie Street leading to Tudor Street and onto New Bridge Street, located south of the site. We have strong concerns on this proposed routing as it uses an uncontrolled road and a give way across Cycleway 6 to give way onto New Bridge street. We would not support any construction access via this route during weekday tidal cycling peaks.

## **Summary**

- Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street
- Further information on the design of the cycle parking, including lift dimensions.
- A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.
- Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.
- Further clarity is needed on the relationship between public and private space within the site.
- We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.
- TfL must be consulted on discharge of the Student Move In Move Out Strategy.
- The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.
- We request a PCL assessment of crossings at the junction of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.
- We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street.

- Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.
- The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.



## Appendix 2

Project	65 Fleet Street
Document Title or Subject	Response to TfL Stage 1 Transport Comments
Document Reference	109185-PEF-XX-XX-TN-TR-000001
Revision Reference	D01
Date	17 September 2024

## 1 Introduction

- 1.1.1 Pell Frischmann (PF) is commissioned by Whitefriars Limited (“the Applicant”) in support of a planning application submitted to the City of London (“CoL”) in connection with proposals at 65 Fleet Street, London, EC4Y 8BQ (“the Site”) (Planning reference 24/00648.FULMAJ).
- 1.1.2 Whitefriars Limited is the owner of 65 Fleet Street. Dominus is co-owner of Whitefriars Limited and development manager for this project. Hereafter, any reference to the applicant will be taken to mean Dominus.
- 1.1.3 This Technical Note (TN) has been prepared in response to TfL comments set out in their letter reference CITY/24/34 received 2<sup>nd</sup> September 2024 and provides additional clarification to points raised.
- 1.1.4 The previously consented planning application (planning reference 19/00058/FULMAJ) was to re-provide a majority office-led scheme with some retail floorspace on the ground and first floors to the north of the building and flexible retail/gym/office uses to the lower ground floor level to both the north and south of the building. The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350sqm GIA from the existing floor area. The proposed development is to be 871-unit student accommodation, with additional learning and non-residential institution, retail/commercial, and public house uplift land uses.
- 1.1.5 From a transport impact perspective, the proposed development generates fewer trips compared to the existing and previously consented land uses and by extension is less impactful on the local network.

## 2 Neighbouring Sites

- 2.1.1 It is confirmed that the outline CLP has been prepared in coordination with the existing construction site at Salisbury Square. The request for a wider gantry can be considered at the detailed design stage and incorporated into the Detailed CLP. –

## 3 Site Access

### 3.1 Cycle Access

- 3.1.1 The proposed cycle lift 2.1 x 2.9m, with a door opening of just over 1000mm, exceeding the minimum dimensions specified in the London Cycle Design Standards (LCDS).
- 3.1.2 While we acknowledge the importance of promoting safe cycling and walking routes in line with London Plan Policy T5, it is not reasonable or necessary for us to provide a new cycleway. We note that the proposed development is not generating any additional trips compared to the consented scheme and therefore additional mitigation is not considered to be necessary. The Community Infrastructure Levy (CIL) associated with the consented scheme has already been paid to CoL and could be used to contribute towards wider infrastructure in proximity to the site.

- 3.1.3 In addition to the above, there is already an eastbound designated bus lane which cyclists are able to use. Westbound between Fleet Street and New Bridge Street, there is limited opportunity or space to implement segregated cycle facilities. However Fleet Street is a 20mph zone, which is a suitable speed for cyclists to share with general traffic.
- 3.1.4 The existing footways and cycleways on Bouverie Street and Whitefriars Street are in good condition. Both streets provide a contra-flow cycle lane and well-maintained footways. While Whitefriars Street is currently undergoing changes associated with the neighbouring Salisbury Square development, it is understood that the contra-flow cycle lane will be reinstated and footways on the eastern side of the road will be widened.
- 3.1.5 The proposed development will not negatively impact these streets, which already provide a safe and adequate environment for both cyclists and pedestrians. A Pedestrian Comfort Level (PCL) assessment will be conducted to demonstrate the impact. Additionally, the servicing yard accessible from Whitefriars Street will be equipped with dropped kerbs to facilitate pedestrian crossing. As such, no further changes are considered necessary.

## 4 Active Travel Zone Assessment (ATZ)

- 4.1.1 The scope of the Active Travel Zone Assessment was agreed upon with CoL, and no requirement for a night-time assessment was raised during that process. The current assessment is considered to provide a sufficient evaluation of the walking and cycling environment, in line with the agreed scope.
- 4.1.2 Whilst there were two clusters of two serious collisions identified in the Vision Zero Analysis, these collisions appear to be as a result of driver error and not due to the highway arrangement. TfL is reminded that the purpose of the ATZ assessment is to raise issues and areas for improvement only. It is not a requirement for the applicant to offer to implement solutions to issues raised unless they are required to make the proposed development acceptable.

## 5 Public Realm and Placemaking

- 5.1.1 The proposals will enable the enhancement and rejuvenation of the existing courtyard at the centre of the site. The proposals seek to ensure a safe, welcoming and secure space, ensuring planting provides good visibility across the scheme and designing out dead spaces.
- 5.1.2 We are not proposing changes to the 3no. existing access points into the courtyard with the exception of the addition of a disabled access lift to provide an accessible route from Whitefriars street. This is located immediately inside the site boundary as you enter. The access routes from Fleet Street and Bouverie Street remain level access per the current situation.
- 5.1.3 The public realm space caters for connecting the north and south blocks of the site where other core activation spaces reside, such as, the Tipperary Pub and Cafe. It is also acknowledged that this space will need to relate with future works of Fleet Street, as part of the Business Improvement District (BID) Plan.
- 5.1.4 Raised planters, together with purposefully located seating, will create pockets of social space that can allow the social dynamics to flourish and assist in general activation of the Public Realm. Opportunities for planting have been maximised to the fullest of the site's potential. A range of seating heights and types will be provided with a variety of arm rests, back rests, transfer spaces and wheelchair nooks to create an inclusive landscape. This will provide opportunity to sit, relax, meet and dwell for all users of the space.
- 5.1.5 The use of key paving types such as York stone and granite setts will seamlessly connect to the wider urban grain of the Fleet Street BID and the adjacent Salisbury Square development. The paving will look to reflect the unique aspects of the site with detailing of Artscape features where appropriate.
- 5.1.6 There are Safety concerns about path proposed between Ashentree Court and Magpie Alley. Magpie Alley sits outside of the site boundary and therefore not in the client ownership and control. Therefore it is not possible for

works to be done there. It would be possible to apply additional building mounted lighting to the outside of the fleet street building to improve illumination. The current proposals will also increase the footfall in the area and therefore improve the existing conditions, within appendix 3 there is also the attached MBLD lighting proposals. There is the opportunity for a condition to be included on the decision notice for an external lighting scheme. However, these would not add illumination to the tunnel portion of the alley.

- 5.1.7 The applicant is agreeing a wayfinding strategy separately with CoL. It is not currently proposed that this incorporate Legible London signage however this will be taken into consideration.

## 6 Trip Generation

- 6.1.1 The delivery and servicing trips for the student accommodation and public house uplift were derived from the TRICS data, which have been attached to this document for reference. The student accommodation servicing trip rates were derived from 'servicing vehicles' whereas the public house servicing trip rates were calculated by combining 'LGV' and 'OGV' categories, as some of the selected surveys lacked data specifically for 'servicing vehicles'.
- 6.1.2 It should be noted that a sensitivity test for the student trip rates was undertaken at the request of CoL Highways and the higher servicing value has been used in the Transport Assessment. The difference in servicing vehicles was 24 per day versus 28 reported.
- 6.1.3 In addition to the above, the research conducted by the Transport Planning Society (TPS) found only 5% of food deliveries are made by car, with the majority using bicycles or two-wheelers. Therefore it is likely that ad hoc deliveries for students will also be made by bicycle, with brief stops on Bouverie Street that will not cause disruption or use of the service yard.
- 6.1.4 Due to the absence of suitable sites on TRICS, a reasonable assumption was made for the delivery and servicing levels of the remaining land uses.
- 6.1.5 The mode share for the student accommodation has been calculated using trip rates derived from the industry-standard TRICS trip rate database, resulting in a 6% mode share in favour of cycling. This is considered reflective of typical student travel patterns. Furthermore, when analysing census data for the City of London 001 MSOA on location of usual residence and place of work by method of travel and redistributing car drivers and passengers across other modes, the census data also suggests a 6% mode share for cycling, further supporting the appropriateness of this figure.
- 6.1.6 As a comparison, the 65 Crutched Friars purpose-built student accommodation (PBSA), previously approved by CoL (planning ref. 22/00882/FULMAJ), proposed an initial cyclist mode share of 3%. The target set to increase bicycle usage by 4% over 5 years, aiming for a 7% mode share.
- 6.1.7 In light of these benchmarks and data sources, the proposed 6% cycling mode share is both realistic and consistent with real-life travel patterns, and therefore is deemed appropriate for the proposed development.

## 7 Pedestrian Comfort Levels

- 7.1.1 A Pedestrian Comfort Level (PCL) assessment will be conducted for the immediate roads around the site. This will follow the submission of these comments. However we note that the proposed development generates fewer peak period trips compared to the consented scheme.

## 8 Cycle Hire

- 8.1.1 The existing office and consented office-led scheme both generate more trips than the proposed development, and therefore we disagree that there will be an increase in demand for these cycle facilities. There is also limited

opportunity to expand this cycle hire facility, with the existing road width to the north accommodating a contraflow cycle lane and a disabled bay immediately south of the existing docking station.

## 9 Delivery and Servicing

9.1.1 Those arriving to the site via cargo bike will be able to use the short stay cycle parking in the courtyard.

## 10 Travel Plan

10.1.1 As outlined in Section 6 above, the baseline of 6% cycling mode share is considered realistic and appropriate for the proposed development, supported by TRICS surveys and journey-to-work census data. This figure is higher than other comparable schemes in CoL, notably 65 Crutched Friars PBSA, which suggests a lower cycling mode share of 3%.

10.1.2 The projected 4% increase in cycling mode share over 5 years aligns with the 65 Crutched Friars target of a 4% increase across the same period. Therefore, a 4% growth in cycling mode share over 5 years is deemed a suitable and achievable target.

10.1.3 The mode split for residents will be confirmed following occupation when surveys will be completed and therefore confirmed mode share targets can be forecast. Annual travel surveys will monitor the Travel Plan throughout its delivery, allowing for targets to be revisited where they are either exceeded or considered insufficient.

## 11 Student Move in and Out Strategy

11.1.1 A Student Move In / Out Management Strategy will be prepared and strictly implemented. This system will be highly managed, with dedicated staff on-site to ensure that there is no queuing or parking on Fleet Street. Staff will direct the entire process and ensure that any vehicles stopping on Fleet Street are immediately moved on.

11.1.2 The strategy will ensure that any vehicles arriving early will be required to leave the area and return at their designated time. This will be a highly managed process to avoid disruption.

## 12 Construction Management

12.1.1 These detailed comments on the construction logistics will be considered and addressed in the detailed CLP, which we expect to be a condition of planning. Please also refer to the letter prepared by DP9 which responds to the comments raised regarding the CLP responded by Mcaleer Rushe.

## 13 Summary

13.1.1 Further clarity has been provided on the development proposals to address TfL's concerns. Of key importance is that the proposals result in a lesser impact on the surrounding highway network when compared to the consented scheme.

13.1.2 CIL payments have already been made associated with the consented scheme and this can be used to contribute towards wider infrastructure in proximity to the site

Appendix A – Servicing and Delivery Trips

This report is to be regarded as confidential to our Client and is intended for their use only and may not be assigned except in accordance with the contract. Consequently, and in accordance with current practice, any liability to any third party in respect of the whole or any part of its contents is hereby expressly excluded, except to the extent that the report has been assigned in accordance with the contract. Before the report or any part of it is reproduced or referred to in any document, circular or statement and before its contents or the contents of any part of it are disclosed orally to any third party, our written approval as to the form and context of such a publication or disclosure must be obtained.

<b>Report Ref.</b>		<b>M2 Westfield TfL - Transport Response TN D1</b>				
<b>File Path</b>		M2 Westfield TfL - Transport Response TN D1				
Rev	Suit	Description	Date	Originator	Checker	Approver
D01	-	Response	09-Aug-24	EH	VB	VB
Ref. reference. Rev revision. Suit suitability.						



Pell Frischmann 5 Manchester Square London

Licence No: 610805

Filtering Summary

Land Use	03/G	RESIDENTIAL/STUDENT ACCOMMODATION
Selected Trip Rate Calculation Parameter Range	100-1100 RESIDE	
Actual Trip Rate Calculation Parameter Range	217-1100 RESIDE	
Date Range	Minimum: 01/01/15	Maximum: 25/06/21
Parking Spaces Range	All Surveys Included	
Days of the week selected	Tuesday	2
	Wednesday	1
	Friday	1
Main Location Types selected	Town Centre	1
	Edge of Town Centre	3
Inclusion of Servicing Vehicles Counts	Servicing vehicles Included	6 - Selected
	Servicing vehicles Excluded	X - Selected
Population within 500m	All Surveys Included	
Population <1 Mile ranges selected	25,001 to 50,000	2
	50,001 to 100,000	2
Population <5 Mile ranges selected	250,001 to 500,000	1
	500,001 or More	3
Car Ownership <5 Mile ranges selected	0.5 or Less	1
	0.6 to 1.0	3
PTAL Rating	4 Good	2
	6a Excellent	1
	6b (High) Excellent	1

Calculation Reference: AUDIT-610805-240312-0346

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 03 - RESIDENTIAL  
Category : G - STUDENT ACCOMMODATION

**MULTI-MODAL TOTAL VEHICLES**

Selected regions and areas:

<b>01</b>	<b>GREATER LONDON</b>	
	CN CAMDEN	1 days
	HM HAMMERSMITH AND FULHAM	1 days
	KI KINGSTON	1 days
	LB LAMBETH	1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*

**Primary Filtering selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Number of residents  
 Actual Range: 217 to 1100 (units: )  
 Range Selected by User: 100 to 1100 (units: )

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/15 to 25/06/21

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

Selected survey days:

Tuesday 2 days  
 Wednesday 1 days  
 Friday 1 days

*This data displays the number of selected surveys by day of the week.*

Selected survey types:

Manual count 4 days  
 Directional ATC Count 0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

Selected Locations:

Town Centre 1  
 Edge of Town Centre 3

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

Selected Location Sub Categories:

Residential Zone 2  
 Built-Up Zone 2

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 6 days - Selected  
 Servicing vehicles Excluded X days - Selected

**Secondary Filtering selection:**Use Class:

C3 4 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.*

Population within 500m Range:

All Surveys Included

**Secondary Filtering selection (Cont.):**Population within 1 mile:

25,001 to 50,000	2 days
50,001 to 100,000	2 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

Population within 5 miles:

250,001 to 500,000	1 days
500,001 or More	3 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.5 or Less	1 days
0.6 to 1.0	3 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

Yes	1 days
No	3 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

4 Good	2 days
6a Excellent	1 days
6b (High) Excellent	1 days

*This data displays the number of selected surveys with PTAL Ratings.*

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
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LIST OF SITES relevant to selection parameters

Site(1):	CN-03-G-01	Site area:	0.10 hect
Development Name:	STUDENT FLATS	Number of residents:	571
Location:	KING'S CROSS		
Postcode:	NW1 0PT		
Main Location Type:	Edge of Town Centre	Survey Date:	14/11/17
Sub-Location Type:	Built-Up Zone	Survey Day:	Tuesday
PTAL:	6a Excellent	Parking Spaces:	
Site(2):	HM-03-G-02	Site area:	0.22 hect
Development Name:	STUDENT FLATS	Number of residents:	217
Location:	HAMMERSMITH		
Postcode:	W6 0BY		
Main Location Type:	Edge of Town Centre	Survey Date:	25/06/21
Sub-Location Type:	Residential Zone	Survey Day:	Friday
PTAL:	4 Good	Parking Spaces:	
Site(3):	KI-03-G-02	Site area:	0.22 hect
Development Name:	STUDENT FLATS	Number of residents:	300
Location:	KINGSTON UPON THAMES		
Postcode:	KT1 3LA		
Main Location Type:	Edge of Town Centre	Survey Date:	26/06/19
Sub-Location Type:	Residential Zone	Survey Day:	Wednesday
PTAL:	4 Good	Parking Spaces:	
Site(4):	LB-03-G-02	Site area:	0.22 hect
Development Name:	STUDENT FLATS	Number of residents:	1100
Location:	LAMBETH		
Postcode:	SE1 7FS		
Main Location Type:	Town Centre	Survey Date:	27/11/18
Sub-Location Type:	Built-Up Zone	Survey Day:	Tuesday
PTAL:	6b (High) Excellent	Parking Spaces:	

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
KI-03-G-01	Not car-free

TRIP RATE for Land Use 03 - RESIDENTIAL/G - STUDENT ACCOMMODATION

**MULTI-MODAL Servicing Vehicles**

**Calculation factor: 1 RESIDE**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. RESIDE	Trip Rate	No. Days	Ave. RESIDE	Trip Rate	No. Days	Ave. RESIDE	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	629	0.002	3	629	0.002	3	629	0.004
08:00 - 09:00	3	629	0.001	3	629	0.001	3	629	0.002
09:00 - 10:00	3	629	0.002	3	629	0.002	3	629	0.004
10:00 - 11:00	3	629	0.003	3	629	0.002	3	629	0.005
11:00 - 12:00	<b>3</b>	<b>629</b>	<b>0.005</b>	<b>3</b>	<b>629</b>	<b>0.005</b>	<b>3</b>	<b>629</b>	<b>0.010</b>
12:00 - 13:00	3	629	0.001	3	629	0.001	3	629	0.002
13:00 - 14:00	3	629	0.003	3	629	0.003	3	629	0.006
14:00 - 15:00	3	629	0.004	3	629	0.005	3	629	0.009
15:00 - 16:00	3	629	0.003	3	629	0.003	3	629	0.006
16:00 - 17:00	3	629	0.003	3	629	0.003	3	629	0.006
17:00 - 18:00	3	629	0.001	3	629	0.001	3	629	0.002
18:00 - 19:00	3	629	0.001	3	629	0.001	3	629	0.002
19:00 - 20:00	3	629	0.002	3	629	0.002	3	629	0.004
20:00 - 21:00	3	629	0.001	3	629	0.001	3	629	0.002
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
<b>Total Rates:</b>			<b>0.032</b>			<b>0.032</b>			<b>0.064</b>

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

Pell Frischmann 5 Manchester Square London

Licence No: 610805

Filtering Summary

Land Use	06/C	HOTEL, FOOD & DRINK/PUB/RESTAURANT
Selected Trip Rate Calculation Parameter Range	220-1123 sqm GFA	
Actual Trip Rate Calculation Parameter Range	220-320 sqm GFA	
Date Range	Minimum: 01/01/14	Maximum: 16/09/22
Parking Spaces Range	All Surveys Included	
Days of the week selected	Wednesday	1
	Friday	1
Main Location Types selected	Town Centre	1
	Edge of Town Centre	1
Inclusion of Servicing Vehicles Counts	Servicing vehicles Included	5 - Selected
	Servicing vehicles Excluded	1 - Selected
Population within 500m	All Surveys Included	
Population <1 Mile ranges selected	50,001 to 100,000	2
Population <5 Mile ranges selected	500,001 or More	2
Car Ownership <5 Mile ranges selected	0.5 or Less	2
PTAL Rating	6a Excellent	2

Calculation Reference: AUDIT-610805-240531-0502

**TRIP RATE CALCULATION SELECTION PARAMETERS:**

Land Use : 06 - HOTEL, FOOD & DRINK  
Category : C - PUB/RESTAURANT

**MULTI-MODAL TOTAL VEHICLES**

Selected regions and areas:

**01 GREATER LONDON**

IS	ISLINGTON	1 days
LB	LAMBETH	1 days

*This section displays the number of survey days per TRICS® sub-region in the selected set*



**Primary Filtering selection:**

*This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.*

Parameter: Gross floor area  
 Actual Range: 220 to 320 (units: sqm)  
 Range Selected by User: 220 to 1123 (units: sqm)

Parking Spaces Range: All Surveys Included

**Public Transport Provision:**

Selection by: Include all surveys

Date Range: 01/01/14 to 16/09/22

*This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.*

**Selected survey days:**

Wednesday 1 days  
 Friday 1 days

*This data displays the number of selected surveys by day of the week.*

**Selected survey types:**

Manual count 2 days  
 Directional ATC Count 0 days

*This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.*

**Selected Locations:**

Town Centre 1  
 Edge of Town Centre 1

*This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.*

**Selected Location Sub Categories:**

Built-Up Zone 2

*This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.*

**Inclusion of Servicing Vehicles Counts:**

Servicing vehicles Included 5 days - Selected  
 Servicing vehicles Excluded 1 days - Selected

**Secondary Filtering selection:****Use Class:**

Sui Generis 2 days

*This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.*

**Population within 500m Range:**

All Surveys Included

**Population within 1 mile:**

50,001 to 100,000 2 days

*This data displays the number of selected surveys within stated 1-mile radii of population.*

**Secondary Filtering selection (Cont.):**Population within 5 miles:

500,001 or More 2 days

*This data displays the number of selected surveys within stated 5-mile radii of population.*

Car ownership within 5 miles:

0.5 or Less 2 days

*This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.*

Travel Plan:

No 2 days

*This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.*

PTAL Rating:

6a Excellent 2 days

*This data displays the number of selected surveys with PTAL Ratings.*

LIST OF SITES relevant to selection parameters

Site(1): IS-06-C-02  
 Development Name: PUB/RESTAURANT  
 Location: CLERKENWELL  
 Postcode: EC1M 7AA  
 Main Location Type: Edge of Town Centre  
 Sub-Location Type: Built-Up Zone  
 PTAL: 6a Excellent

Gross floor area: 320 sqm  
 Parking spaces: 0  
 No of Employees: 8  
 Survey Date: 30/09/16  
 Survey Day: Friday

Site(2): LB-06-C-01  
 Development Name: PUB/RESTAURANT  
 Location: WATERLOO  
 Postcode: SE1 8TJ  
 Main Location Type: Town Centre  
 Sub-Location Type: Built-Up Zone  
 PTAL: 6a Excellent

Gross floor area: 220 sqm  
 Parking spaces:  
 No of Employees: 13  
 Survey Date: 22/06/16  
 Survey Day: Wednesday

TRIP RATE for Land Use 06 - HOTEL, FOOD & DRINK/C - PUB/RESTAURANT

**MULTI-MODAL OGVS**

Calculation factor: 100 sqm

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00									
09:00 - 10:00									
10:00 - 11:00	1	220	0.000	1	220	0.000	1	220	0.000
11:00 - 12:00	<b>1</b>	<b>220</b>	<b>0.455</b>	<b>1</b>	<b>220</b>	<b>0.455</b>	<b>1</b>	<b>220</b>	<b>0.910</b>
12:00 - 13:00	2	270	0.000	2	270	0.000	2	270	0.000
13:00 - 14:00	2	270	0.000	2	270	0.000	2	270	0.000
14:00 - 15:00	2	270	0.000	2	270	0.000	2	270	0.000
15:00 - 16:00	2	270	0.000	2	270	0.000	2	270	0.000
16:00 - 17:00	2	270	0.000	2	270	0.000	2	270	0.000
17:00 - 18:00	2	270	0.000	2	270	0.000	2	270	0.000
18:00 - 19:00	2	270	0.000	2	270	0.000	2	270	0.000
19:00 - 20:00	2	270	0.000	2	270	0.000	2	270	0.000
20:00 - 21:00	2	270	0.185	2	270	0.185	2	270	0.370
21:00 - 22:00	2	270	0.000	2	270	0.000	2	270	0.000
22:00 - 23:00	2	270	0.000	2	270	0.000	2	270	0.000
23:00 - 24:00	2	270	0.000	2	270	0.000	2	270	0.000
Total Rates:			0.640			0.640			1.280

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 06 - HOTEL, FOOD & DRINK/C - PUB/RESTAURANT

**MULTI-MODAL LGVS**

**Calculation factor: 100 sqm**

**BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00									
08:00 - 09:00									
09:00 - 10:00									
10:00 - 11:00	1	220	0.455	1	220	0.455	1	220	0.910
11:00 - 12:00	1	220	0.455	1	220	0.000	1	220	0.455
12:00 - 13:00	<b>2</b>	<b>270</b>	<b>0.556</b>	<b>2</b>	<b>270</b>	<b>0.741</b>	<b>2</b>	<b>270</b>	<b>1.297</b>
13:00 - 14:00	2	270	0.000	2	270	0.000	2	270	0.000
14:00 - 15:00	2	270	0.556	2	270	0.556	2	270	1.112
15:00 - 16:00	2	270	0.185	2	270	0.185	2	270	0.370
16:00 - 17:00	2	270	0.000	2	270	0.000	2	270	0.000
17:00 - 18:00	2	270	0.370	2	270	0.370	2	270	0.740
18:00 - 19:00	2	270	0.000	2	270	0.000	2	270	0.000
19:00 - 20:00	2	270	0.000	2	270	0.000	2	270	0.000
20:00 - 21:00	2	270	0.000	2	270	0.000	2	270	0.000
21:00 - 22:00	2	270	0.556	2	270	0.556	2	270	1.112
22:00 - 23:00	2	270	0.000	2	270	0.000	2	270	0.000
23:00 - 24:00	2	270	0.000	2	270	0.000	2	270	0.000
<b>Total Rates:</b>			3.133			2.863			5.996

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.



## NHS London Healthy Urban Development Unit

Kieran McCallum  
Planning Department  
City of London  
PO Box 270.  
Guildhall London EC2P

15<sup>th</sup> October 2024

Dear Kieran,

### **Planning Application 24/00648/FULMAJ 65 Fleet Street, London**

Further to our telephone conversations I confirm our request for a contribution of £45,000 towards the mitigation of the adverse impacts of the development on local health infrastructure. This sum will enable the reconfiguration and upgrading of non-clinical space to clinical space and is considered to meet the tests set out in the CIL Regulations for contributions.

We have reviewed the planning application and supporting documents. We welcome the commitment you outlined in our discussions that the applicant is making for voluntary and community activities within the site. However, given the scale of the proposed development the impact across all types of health infrastructure will be significant and will require mitigation.

We would usually expect a more detailed HIA to be undertaken for a scheme of this scale and mix of uses rather than the HUDU Checklist and would suggest that public health colleagues are consulted for their views.

Reference is made to daylight being challenging; however, it is important to ensure that communal spaces or those where students may study or spend daytime has maximum daylight.

Reference is made to lifts needing to be large enough for a trolley bed, however, they should be large enough for a trolley bed and two paramedics with their equipment.

While pedestrians and cyclists are being given priority it is important that pedestrians are considered separately as there can be conflict between cyclists and pedestrians, and cycle parking/storage should be safe and accessible. There should be adequate parking for emergency vehicles and for service vehicles to ensure pedestrian routes are not impeded.

The completed HIA template refers to managing noise from outside the building, however, it is important that there is adequate insulation between units to ensure privacy, and noise can

be a contributor to stress and poor health. It is important that the occupiers can have private conversations without being overheard in adjoining rooms when talking at a normal level.

The inclusion of a pocket park and enhancement of the public realm are welcome; however, an ongoing management plan is important. We recommend that the management arrangements are secured by planning condition or the S106 agreement in perpetuity.

The North East London Integrated Care System and North East London Integrated Care Board's area includes the City. The NEL ICS Infrastructure Strategy is currently in preparation and there will be a prioritisation of large projects to address the cumulative growth from this and similar schemes with the intention of seeking CIL monies where S106 contributions cannot achieve mitigation. This may include expansion of inpatient care for example. However, as discussed, we consider a modest contribution secured via the S106 agreement enabling the conversion of non-clinical space (administrative or storage for example) to increase clinical capacity alongside the arrival of the new student population is important in the short term.

The figure of £45,000 referenced earlier is a very modest, but important contribution. The calculations from the HUDU Planning Contributions Model, (the methodology referenced in the London Plan for assessing the cost of mitigation for health infrastructure) indicates the capital cost to the NHS of creating additional capacity could be in the region of £1.7m. While this assumes new buildings/extensions it does not include outpatients, accident and emergency and ambulance infrastructure. The summary table from the HUDU Model is included below for information. This also includes a revenue figure which is not sought from developers, but we consider it important for yourselves and the applicant to understand there are wider costs to the NHS placing additional pressure on budgets and services.

Final Summary	
Total Capital Cost	£1,730,777
Total Revenue Cost	£1,283,536
Combined Cost	£3,014,314
Total Number of Housing Units	871
Capital Cost Requirement Per Unit	£1,987

Please let me know if you require any further information.

Yours sincerely,



Mary Manuel  
Head of the NHS Healthy Urban Development Unit

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**From:** Sells, Oliver

**Sent:** 16 October 2024 11:42

**To:** Richards, Gwyn

**Subject:** 65 Fleet Street. Planning Application. Letter to the Planning Committee

**Importance:** High

Dear Members,

I write in my capacity as a member of the Court for the Ward of Farringdon Without and as the Deputy Chair of the Capital Buildings Board. I also live and work in the inner Temple. Fleet Street has suffered grievously since the demise of the print industry in this area and the aftershock of Covid.

Many offices and shops have closed and footfall has declined dramatically.

In order to remedy this unhappy situation the City has made great efforts in the last few years to bring life and economic activity back to this historic part of the City, including granting permission for the very significant Salisbury Square Development.

The instant application aims to bring new life to the old Freshfields building in the form of student accommodation and retail and other space. It has already produced new life at the Tipperary and nearby shops.

This site is close to the Temple and I know that the Inns of Court College of Advocacy is in discussions about the provision of low cost accommodation for some of their students.

This would obviously be of great benefit in an area of high cost accommodation.

I hope very much that members will support this application which seems to me to bring all the benefits of high grade accommodation; shared space; a terrace and cultural opportunities.

Yrs

Oliver Sells

**Oliver Sells KC. CC.**

**Members Room**

**PO Box270**

**Guildhall**

**London**

**EC2P 2EJ**

**Member of the Court of Common Council for the  
Ward of Farringdon Without.**

Telephone

Email

[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)





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