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**Borough Ref:** 20/00816/FULEIA

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Transport for London  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

## Sent by Email

10<sup>th</sup> February 2021

Dear Kurt Gagen

### **70 Gracechurch Street, London EC3V 0HR - TfL Stage 1 Comments**

Thank you for consulting Transport for London (TfL) on the proposed redevelopment on 70 Gracechurch Street, London EC3V 0HR.

*The following comments are made by Transport for London officers on a 'without prejudice' basis only. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme. Furthermore, these comments also do not necessarily represent the views of the Greater London Authority.*

## **Development Proposal**

The application is referable to the Mayor under Category 1Cb of the Mayor of London Order (2008), as the development proposal is more than 150 metres high and is in the City of London

*Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.*

*(The proposal would provide 72,992sq.m GEA of Class E offices, 1,823sq.m GEA flexible retail use (Class E, drinking establishment (Sui Generis), hot food takeaway (Sui Generis)); 1,566sq.m Sui Generis public viewing gallery; total floorspace 76,380sq.m GEA; overall height 154.725m AOD)*



## Principle of development

The proposed development complies broadly in principle with Publication London Plan policies T1 (Strategic approach to transport), T7 (Deliveries, Servicing, construction) and D8 (Public Realm).

Some detailed elements of the proposals nonetheless raise issues of policy compliance with policy T2 (Healthy Streets), T3 (Transport capacity, connectivity and safeguarding), T4 (Assessing and mitigating transport impacts) as explained further below.

## Summary

- S106 through Section 278 for highway works on Borough Highway.
- Section 278 contribution for highway works on the TLRN.
- A full Line Load Impact Assessment for all LU stations within walking distance
- Cycle parking provision and facilities should be secured by condition.
- S106 contribution of £150,000 for Cycle Route Quality Criteria Check and works identified therein
- A Parking Design and Management Plan (PDMP) to be secured by condition.
- A full Deliveries and Servicing Plan (DSP) should be secured by condition with restrictions to night-time out of peak hours for all servicing.
- A full CLP should be secured by condition with RSA for all vehicle construction routes.

## Site Location and Context

The development is located on the Transport for London Road Network (TLRN), Gracechurch Street, along its western frontage, with local highway routes Fenchurch Street to the south, Lime Street to the east and Ship Tavern Passage to the north. As Gracechurch Street A1213 forms part of the TLRN, TfL is the highway authority. The nearest part of the Strategic Road Network (SRN) is Eastcheap, approximately 150m south.

The site has a Public Transport Access Level rating (PTAL) of 6b, which is considered excellent. The closest London Underground (LU) station is located 180m south east at Monument and the site is within walking distance of Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument and Cannon Street, providing access to a wide range of LU, London Overground, National Rail, TfL Rail and Docklands Light Railway (DLR) services. Liverpool Street will also be served by the Elizabeth Line. There are 21 bus services within walking distance of the site.

Cycle Superhighway 3 (CS3) is located 320m south of the site on Lower Thames Street. CS3 provides links from Barking to Tower Gateway. The nearest Cycle Hire docking station is located 225m southeast on Eastcheap.

## Healthy Streets and Vision Zero

The development proposes public realm improvements including a new pedestrian route from Ship Tavern Passage to Fenchurch Street facilitating shorter pedestrian and cycling trips in line London Plan Policy T2. Public realm improvements also extend to the improvement of lighting, footways, new trees on Lime Street and a proposed super crossing across Fenchurch street.



The proposed realignment of the junction between Philpot Lane and Lime Street, Gracechurch Street footway widening from 1.4m-1.9m, widening of the eastern pavement on Lime Street and the western pavement width of Philpot Lane would improve Pedestrian Comfort Levels (PCL) around the site. This will be enabled by the relocation of a taxi bay to the south and a removal of yellow lines along Fenchurch Street. This is strongly supported in line with policies D8 (Public Realm) and should be secured by section 278 and section 106 agreement as appropriate. All highway works proposed, secured and eventually delivered should follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The applicant should also consider the recommendations of the stage 1 safety audit for the final design.

The Transport Assessment (TA) has identified two collision clusters where deaths and serious injuries have occurred in the recent highway safety record. These are at the junction of Gracechurch Street, Lombard Street and Fenchurch Street, and the junction of Fenchurch Street and Philpot Lane. The applicant should consider measures to mitigate any safety risk and deliver measures accordingly.

## **Pedestrian Comfort Levels (PCL)**

The proposals are supported by a PCL assessment which is welcome. The growth factor assumed for future baseline pedestrian movement is acceptable in principle, as is the 10% diversion assumption for the new through-route. The Pedestrian Comfort Level (PCL) assessment has been provided with updated base flows along Gracechurch Street, reflecting the current pedestrian distribution model. which is accepted.

Further discussion on junction improvement scheme works along Gracechurch Street is welcome. PCL Base 2027 with development scores have been accepted, this is within TfL's PCL Guidance for office / retail developments and the City of London City Cluster Vision policy document.

Due to the findings at paragraph 5.5.3 of the TA PCL analysis, the development must fund a proportionate and reasonable contribution to Section 106, Section 278 (S278) with TfL as the highway authority, for works proposed on the TLRN adjacent to the site, to widen the footways. This is necessary to ensure expected future PCL scores of C and D do not occur in the future baseline with development with diversion assumed scenario, as currently indicated by the TA.

It should be noted that the footway widening currently implemented at this location as part of the Streetspace for London programme is temporary. The highway works and planning obligations proposed to support this development should therefore be updated prior to determination to ensure that they will be robust and deliverable, with sufficient flexibility for if the Streetspace for London works either become permanent or are removed.

If the widened footways are eventually made permanent, it may be appropriate for this development to fund the physical works and approvals required to deliver that, given that it would directly benefit employees and visitors of the new development, and ensure policy compliance against the strategic transport policy of the Publication London Plan.



## Trip Generation and public transport impact

Further improvements are required to the trip generation analysis.

The trip generation data tables should include Trains Per Hour (TPH) at the specific stations assessed rather than using a more generous TPH rate from other points along the London Underground line (LU) they serve. An updated trip generation assessment including Trains Per Hour (TPH) of related stations has been agreed, this should be provided before permission is granted.

The applicant should also assess all LU stations within walking distance of the development, not just Monument. Whilst a Station Capacity Assessment has been provided for Monument, a full Line Load Impact Assessment should be undertaken using TfL Rail Plan data.

The proposed trip rates for new travel expected to be generated by the new development are likely to be acceptable in principle but the TA should be updated prior to determination to specify where the rates in Table 5.3 originate from and why they are being used.

## Cycle Parking

1,002 long stay cycle parking spaces are proposed at the lower ground level; this complies with standards in London Plan Policy T5. 85% would be Two-Tier cycle racks, 10% folding bicycle lockers, and 5% Sheffield stands and 3 would be tricycle parking spaces.

All the long-stay cycle parking aisle widths must be at least 2.5m beyond the lowered frame to comply with the London Cycling Design Standards. In addition, access to a number of cycle racks proposed at the lower ground floor should be amended to provide wider access. At least 5% of cycle parking will be suitable for larger and adapted cycles which is also welcome supporting London Plan policy T5.B.

The proposals provide showers and lockers within the Lower Ground Mezzanine and Lower Ground levels, which is welcomed. Two dedicated cycle parking lifts and a gullied cycle stair are proposed, accessible at ground floor level adjacent to a dedicated cycle entrance proposed in Ship Tavern Passage.

In order to reduce potential waiting times and improve the flow of cycle parking users, the applicant has clarified cycle lift capacity will accommodate a minimum of two cyclists per lift. LCDS specifies a maximum of two set of doors between cycle stores and the development surroundings.

TfL welcome the clarification of cycling access/egress routes along Lime Street. The applicant should ensure all routes shared with service vehicles are maintained and in line with Vision Zero objectives in London Plan policy T7.

22 short stay cycle spaces are proposed whereas 102 spaces would be required. The location of short stay cycle spaces is nonetheless supported as it would relate well to expected pedestrian desire lines,

The applicant proposes 20% more long stay cycle parking to maintain pedestrian comfort around the site. Due to space constraints and unique characteristics of this development site, offsetting short stay with long stay cycle parking is considered reasonable in this case.

The detailed design and delivery of all cycle parking should be secured by condition.



## Cycling

The applicant should consider which cycle routes would link with CS3 in accordance with London Plan policy T5.

TfL's Cycle Route Quality Criteria Check tool should therefore be used to assess the route between the site and CS3 prior to determination, to show whether segregation or street changes such as removal of on-street car parking needed to support that route. TfL has agreed a cycle hire contribution of £150,000 to fund a Cycle Route Quality Criteria Check study and works identified therein. This should be secured by S.106 agreement.

## Cycle Hire

The nearest Cycle Hire docking station at Eastcheap, is the 30<sup>th</sup> busiest out of over 800 in London. This development would increase demand for Cycle Hire and increasing Cycle Hire capacity would directly benefit employees and visitors of the new development, supporting compliance with London Plan policy T5. TfL requested a S106 contribution of £220,000 to fund a new Cycle Hire docking station in the vicinity, this has been resolved as cycle route improvements contributions has been agreed.

## Car parking

The proposal is car-free except for one accessible parking space proposed at the ground level, accessed from Lime Street. The disabled car parking space proposed would have an Electric Vehicle Charging Point which is welcome in accordance with Publication London Plan policy T6.3 (Retail parking) part F.

A Parking Design and Management Plan (PDMP) should be secured by condition in accordance with policy T6.2 part G and discharged prior to commencement of construction. This should include details for the design and management of all parking including LCDS-compliant cycle parking.

## Deliveries and Servicing

Deliveries, servicing and refuse collection are proposed within a basement area with four loading bays, storage spaces and a turntable large enough for 10m rigid vehicles, accessed from flatbed vehicle lifts via Lime Street. The design, number of vehicles, access and hours of operation are considered reasonable and should be secured by condition, though the applicant should clarify how access to the disabled parking space would be retained.

A full Deliveries and Servicing Plan (DSP) should be secured by condition and discharged in consultation with TfL due to the close proximity of the TLRN. This multi-use of the basement area loading bay are robust in principle as deliveries and servicing is restricted, the applicant should confirm how the management of the pop-up retail floorspace will be maintained over the timeline of the development.

## Construction

An outline Construction Logistics Plan (CLP) has been submitted. This includes proposals for two loading lanes, one located on Fenchurch Street and the other on Gracechurch Street.

No construction access should take place directly from the TLRN at Gracechurch Street. Any proposals for construction vehicles to use the Gracechurch Street. Lombard Street and Fenchurch Street junction should be supported by a RSA to determine the safety of vehicle movements in line with the Mayor's Vision Zero agenda.



A full CLP should also be secured by condition. All construction proposals in the full CLP should also support the Mayor's Vision Zero Action Plan.

The full CLP should follow TfL guidance, and TfL should be consulted prior to discharge of the CLP condition due to the close proximity of the TLRN. The CLP will need to ensure that all vehicle movements during construction are safe, efficient and legal, minimising the risk of collision with vulnerable road users such as cyclists and pedestrians. All construction vehicles should meet the Direct Vision Standard and have a HGV safety permit if eligible (see TfL Direct Vision Standards here: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>). The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS).

Yours sincerely,

**Deborah Ewenla**

v\_deborahewenla@tfl.gov.uk

**Assistant Planner, TfL Spatial Planning**