

Appendix C: Comments from statutory groups

Comment	Response
City of Westminster	
Support principle of project and need for improved facilities for walking and cycling	Comment noted.
Concerns that proposals could lead to some increase on certain roads e.g. Charlotte Street, Cleveland Street, Frith Street, Newman Street and Shelton Street,	The traffic impacts of the proposals have been assessed using an approved Transport for London traffic model which predicts that the proposals would lead to an overall reduction in traffic in the area as well as quicker bus journeys. Whilst, there are some streets that would have an increase in traffic the majority of these are not considered significant. If the project were approved the traffic levels on all streets in the area would be monitored before and after implementation and if adverse impacts were identified they would be mitigated where possible and appropriate.
Concerns from residents about traffic access into Fitzrovia	Residents and other traffic in private cars would be able to access Fitzrovia via Gower Street and either Howland Street or Grafton Way
Freight Transport Association	
Supports aims of project but must work for all road users. Will be increased demand for servicing which must be catered for	Comment noted.
Proposal for one hour loading bays on TCR in peak periods not adequate and times of loading bays on side roads are confusing.	To address concerns from businesses it has been recommended to allow loading from 10am-12pm. In addition, An out of normal hours delivery trial for Tottenham Court Road is proposed, following this consultation, as set out in Appendix A.
Not all deliveries can be made from side roads for health & safety reasons.	The Council would work with freight operators to ensure that loading facilities are appropriate to service the needs of frontages.

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Freight Transport Association	
The restrictions would lead to additional time, mileage and emissions from vehicles	To address concerns from businesses alternative loading hours have been recommended. An out of normal hours delivery trial for Tottenham Court Road is proposed as set out in Appendix A. In addition, to allowing loading from 10am-12pm.
Drivers making multiple deliveries on TCR should be exempt from restrictions	
If restrictions are implemented there should be a considerate approach to enforcement at the start of operation	Restrictions would be clearly publicised and signed prior to any enforcement. All measures would be considered to ensure that enforcement is reasonable and appropriate.
Guide Dogs for the Blind	
Detailed comments on streetscape design including in relation to the importance of kerbs and tactile paving, logical layouts and removal of street clutter, the consideration of the use of tactile guidance paths and visual contrast, audible signals at tactile cones at pedestrian crossings.	These comments would be considered and taken into account, as appropriate, at the detailed design stage, should the proposals be taken forward.
On Tottenham Court Road, controlled pedestrian crossings with dropped kerbs and tactile paving should be provided at regular intervals, and particularly near bus stops and key destination points. Crossings should be provided with audible and tactile signals (i.e. rotating cone). Controlled crossings should be provided at the beginning and end of pedestrian zones and shared spaces and, (for large areas or long streets) at key points where people need to cross areas. Informal crossing points may also be provided at strategic points to supplement controlled crossings, but they should not replace them.	Controlled pedestrian crossings are proposed at all signalised junctions on Tottenham Court Road and at regular intervals. No pedestrian zones are proposed. All crossings would be fitted with tactile cones. Audible signals are not fitted as standard to controlled crossings in Camden. Further consideration needs to be given as part of detailed design as to whether audible signals would be appropriate at this location, subject to environmental health considerations.

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<p>Guide Dogs for the Blind</p>	
<p>On Gower Street and Bloomsbury Street, favour the option to segregate cyclists from pedestrian pathways to ensure the confidence of blind and partially sighted pedestrians in the area. Loading bays should be clearly marked to ensure that parked vehicles in these areas are out of the way of pedestrians. Different use areas within street scenes should be clearly delineated by the use of: clear, unambiguous physical delineation such as a kerb with dropped kerb crossing points, surface level, such as tactile paving or differences in texture; and visual contrast at surface level. Contrast can be provided either as a band or by changes in colour between different use areas.</p>	<p>Comment noted. Where loading bays are located on the pavement, the space is intended for use by pedestrians when not occupied by vehicles and therefore it is not necessary to use contrasting colours or surfaces. However, the extent of the bays would be clearly marked for drivers and enforced. Comments regarding different use areas within street scenes would be addressed at the detailed design stage, if the proposals were taken forward.</p>
<p>Cycle parking in any green space or newly developed park must include signage that prevents cyclists from riding bikes through these areas, until they reach the cycle lanes or roads.</p>	<p>Cycling would not be permitted in pedestrian areas unless indicated. If cycling in a park were to become an issue, signage could be considered as a remedial measure. In general, the Council aims to minimise unnecessary signage.</p>
<p>Licensed Taxi Drivers Association</p>	
<p>Concerned about impacts on elderly, people with reduced mobility, people with bulky shopping and taxi trade</p>	<p>The proposals would still allow taxis to serve the area with taxi ranks and stopping locations provided at key locations. Taxis would only be restricted from short sections of TCR at certain times in the day. On TCR 60% of the street would be open to taxis in at least one direction from 8am to 7pm. After 8pm the street would be open to taxis and other traffic to assist the night time economy and safer travel home. Further detail of the assessments of taxi access on TCR, including access for disabled people is provided in Appendix A.</p>

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Licensed Taxi Drivers Association	
By 2020 all taxis will be zero emission so there would be no pollution impact if taxis were exempt	There is uncertainty about when the majority of taxis in London will be zero emission. The restrictions on TCR would be reviewed if the Ultra-Low Emission Zone were introduced to assess the impacts of allowing taxis along the full length of TCR on air quality, congestion, road safety and the environment for walking and cycling.
If taxis are restricted there would be more congestion and pollution as other vehicles would be forced to wait for pick up / drop off	The proposals include areas for pick up and drop off on TCR and side roads. It is not expected that taxi operations would create additional congestion or pollution.
Excluding taxis would encourage rickshaws to use TCR	The issue of rickshaws in the West End remains a concern in several areas of the West End and work is ongoing to ensure that their use does not impact on the public realm or traffic congestion.
The impact on traffic congestion on Gower Street has been ignored.	The traffic impacts of the proposals have been assessed using an approved Transport for London traffic model which predicts that the proposals would lead to an overall reduction in traffic in the area (including on Gower Street) as well as quicker bus journeys.
The restrictions will lead to longer taxi journeys and increased fares for passengers.	The traffic modelling predicts that traffic across the area would go down and therefore the restrictions may not lead to longer and more expensive journeys.
Disabled taxi users are entitled to access all facilities on TCR	Further detail of the assessments of taxi access on TCR, including access for disabled people is provided in Appendix A.
The proposed cycle lanes in Gower Street will be blocked by taxis and will make it difficult for passengers to get in / out of taxis	The design of the cycle lanes would discourage taxis or other vehicles from blocking them. The cycle lanes would have a kerb next to the carriageway to make it easy for passengers to get in and out of taxis.

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Comment	Response
Licensed Taxi Drivers Association	
The size of the taxi rank for TCR station is inadequate	The taxi rank for TCR station is proposed to be moved from the east side of TCR to the west side to improve access to taxi drivers and increased in size from three to four spaces.
Living Streets	
Support proposals for removing gyratory, wider pavements, new public spaces, better crossings, slower traffic and space for cycling.	Comment noted.
Concerns about reduced pavement width on Gower Street	To provide safe and attractive cycle facilities it is necessary to slightly reduce pavement widths on Gower Street. An assessment of pedestrian volumes suggests that the proposed pavement widths will safely accommodate pedestrian numbers.
Concerns about volumes of buses on TCR	The frequency of buses is determined by Transport for London (TfL).
Ensure that the detailed design is fully inclusive and work with mobility groups	Comment noted.
Ensure that detailed design encourages driving speed at 20 mph or less	Comment noted.
London Ambulance Service	
Concerned about impact on emergency response times.	The traffic modelling predicts that traffic in the area as a whole would reduce and therefore it would be unlikely that emergency response times would increase within the area. However, traffic flows would be monitored before and after implementation and if adverse impacts were identified, attempts would be made to mitigate these impacts if possible and appropriate.
London Travelwatch	
Support the proposals and would like impacts monitored to assess if bus performance can be maximised.	If the scheme were approved the impacts would be monitored and reviewed where appropriate.
Support removal of gyratory, excluding general traffic and taxis from TCR and allowing buses to serve passengers in both directions on TCR	Comment noted.

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London Travelwatch	
Concerns that TCR restrictions do not cover late evenings or Sundays and request this is reviewed and monitored after introduction.	Comment noted.
Concerns about delays to bus route 38 and requests that measures are put in place to mitigate	Further discussions would be held with Transport for London to mitigate any significant delays to bus services.
Concerns about the use of light segregation and the potential for this to be a hazard to pedestrians crossing the street.	It is recommended that the design of the cycle lanes be amended to “stepped tracks” (such as on Old Shoreham Road, Brighton,) protected by a height difference from the road, and also from the pavement, to provide increased protection for cycling. This may provide some benefit to pedestrians by increasing the effective pavement width, when the cycle lanes are not in use by cyclists.
Metropolitan Police	
Supports the proposals provided no adverse impact on operations or emergency response times.	Comment noted.
Support the restriction of TCR to buses and cycles only and would not support including taxis because of increase in traffic, congestion and casualty risks.	Comment noted.
Concerns about lack of separation between buses and cycles on TCR but welcome protection for cycling on Gower Street	Providing separation between buses and cycles on TCR would require pavements to be narrowed. With the increase in pedestrians the pavements would not be able to effectively cope. An assessment of the options of separating buses and cycles on TCR is included in Appendix E.

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Metropolitan Police	
There is a lack of pedestrian crossings on TCR	Pedestrian crossings would be provided on each side road at every signalised junction on Tottenham Court Road, with the exception of Hanway Street where it would not be possible due to large vehicles overhanging the pavement as they turn into Hanway Street to service businesses there. In addition, a Pelican crossing would be provided on TCR south of Store Street. Pedestrian crossing facilities would be reviewed following implementation, if the proposals were taken forward, to assess whether additional formal crossings were required.
Transport for London (TfL)	
Support proposals to transform area and introducing two-way working for buses and cycles	Comment noted.
Support proposals to simplify bus routes and make buses quicker and more reliable	Comment noted.
Suggest that further improvements for cycling can be realised in next stage of design	Following public consultation, further improvements to cycling have been included within the project. These proposals include wider stepped cycle tracks on Gower Street, safer junctions for cycling and an improved link from Bloomsbury Way to Endell Street.
Examine possible dispersal of traffic and traffic queues and would like assurances that taxi restrictions would not adversely impact surrounding streets	These concerns would be addressed in ongoing discussions with TfL as part of the traffic approval process for a major scheme.
Consider taxi access restrictions on disabled people	The impacts of the proposals on people with reduced mobility have been considered and further details are included in Appendix A.
Consider impact of construction of project with other permitted developments in the area.	The Council has set up a working group to coordinate all traffic and development proposals in the area including developers, Crossrail, TfL and City of Westminster.

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Comment	Response
Transport for London (TfL)	
There is no northbound bus stop near Windmill Street on Tottenham Court Road, which would be desirable.	Following comments raised in public consultation additional changes to bus stops have been made including relocating a bus stop nearer to Windmill Street.
Consider impact on traffic congestion of relocating taxis to Gower Street	The proposals have been assessed using an approved TfL traffic model which highlights the proposals would lead to 30% less traffic on Gower Street.
Consider how people with disabilities or luggage can access taxis in restricted sections of TCR.	The proposals would still allow taxis to serve area with taxi ranks and stopping locations provided at key locations. Taxis would only be restricted from short sections of TCR at certain times in the day. On TCR 60% of the street would be open to taxis in at least one direction from 8am to 7pm. After 8pm the street would be open to taxis and other traffic to assist the night time economy and safer travel home. Further detail of the assessments of taxi access on TCR, including access for disabled people is provided in Appendix A.
Request more information on size, location, hours and access of taxi ranks proposed	Further discussions would be held with TfL to discuss taxi rank proposals in more detail.
Request clarification on taxi access from New Oxford Street to Dominion Theatre taxi rank	The taxi rank for TCR station is proposed to be moved from the east side of TCR to the west side to improve access to taxi drivers from New Oxford Street.
The cycling proposals for TCR are in line with the approach recommended in the London Cycling Design Standards but will need careful design to ensure cyclists feel safe and comfortable integrating with buses and at junctions.	Comment noted.
Support the increase in cycling permeability by making more side streets two-way for cycling.	Comment noted.

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Transport for London (TfL)	
Concerns that light-segregation for cyclists may not be effective and that the effective width will be close to 1m. Should ensure that lanes are as wide as possible and carefully consider the risk of “dooring” by taxis.	Following public consultation, the cycle lanes on Gower Street have been amended to provide between 1.75m and 2m width stepped tracks, protected by a height difference from the road, and also from the pavement.
Transport for All	
Generally support proposals	Comment noted.
Need to ensure that TCR does not become a no go zone for people with reduced mobility.	Comment noted.
Request that exemptions to the TCR restrictions be given to blue badge holders	Whilst it might be desirable to provide exemptions for certain vehicles carrying disabled people, there would be no way to exempt disabled drivers or passengers from these restrictions, using normal traffic management processes. However, additional Blue Badge parking bays would be provided as part of the proposals.
London Cycling Campaign / Camden Cycling Campaign	
Support vision for transforming the area and relocating road space to walking and cycling as well as improved permeability for cycling.	Comment noted.
Demand international standard protected space (minimum of 2m wide lanes) for cycling on either TCR or Gower Street	Following public consultation, the cycle lanes on Gower Street have been amended to provide between 1.75m and 2m wide stepped tracks, protected by a height difference from the road, and also from the pavement. An assessment of options to provide 2m wide cycle lanes on TCR and Gower Street has been undertaken and is included in Appendix E.
The traffic restrictions on TCR need to ensure that all traffic is only local traffic and not through traffic and that no traffic displaces on Central London Grid Routes.	Preventing through traffic on east / west routes (e.g. Torrington Place / Howland Street and Goodge Street / Chenies Street) would create additional displaced traffic on adjacent roads within Camden and Westminster and create very difficult access for residents in Fitzrovia.

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<p>London Cycling Campaign / Camden Cycling Campaign</p>	
<p>Would not support the proposal to allow taxis to use TCR and the restrictions should apply 24/7 on every day of the week (except service vehicles without rear access between 11pm and 7am).</p>	<p>Comment noted.</p>
<p>The Capper Street / TCR junction should be modified to allow this route avoiding TCR</p>	<p>Following public consultation a detailed examination has been undertaken looking at all east / west options from Torrington Place to Maple Street. This study has highlighted that the optimal westbound route is Torrington Place to Howland Street, which would be safe and attractive with protected cycle lanes on Torrington Place and safer junctions. It also links with routes into Westminster and provides connectivity as part of the London Cycle Grid. In addition, the route via Huntley Street to Capper Street would also be facilitated.</p>
<p>The design speed of TCR should be 15 mph</p>	<p>The proposals for TCR are designed to encourage slower driving speeds and include areas where the road would be the same height as the pavement. Similar proposals in other projects (e.g. Camden High Street) have reduced traffic speeds below 20 mph.</p>

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<p>London Cycling Campaign / Camden Cycling Campaign</p>	
<p>All junctions on TCR and Gower Street should be designed to eliminate left turning collisions with cyclists.</p>	<p>Junctions on TCR would separate north / south cycles from east / west traffic in time using different traffic signal phases to reduce conflicts with turning vehicles. Similarly the proposal for Euston Circus removes all left turning conflicts for cyclists on TCR, as does the proposal for Grafton Way / Gower Street. For Gower Street, Bloomsbury Street and Shaftesbury Avenue, where left turning movements are higher and where possible, such as at Torrington Place and at Princes Circus, the proposals separate, in time, left-turning traffic from cyclists travelling straight ahead, using different traffic signal phases. Northbound cyclists would be encouraged through routing to turn left at Grafton Way / Gower Street to reduce the incidence of conflicts. There are also a number of junctions with side streets on Gower Street and Bloomsbury Street where the left turn would be banned and therefore the conflicts would not occur.</p>
<p>There should be a direct cycle link from Shaftesbury Avenue to Endell Street</p>	<p>Following public consultation, amended proposals have been developed to include a more direct and safer route from Shaftesbury Avenue to Endell Street and a direct link from Bloomsbury Way to Endell Street via Grape Street.</p>
<p>Cycling parking should be provided on the wider sections of TCR</p>	<p>Cycle parking would be provided on side roads to provide sufficient parking whilst also keeping the pavements clear of street furniture to cater for the large pedestrian numbers.</p>
<p>City of London</p>	
<p>Opposed to Alfred Place proposals due to impact on commercial operations and viability of Estate.</p>	<p>The proposals would not adversely impact on businesses or the City's ongoing management of the Estate.</p>

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City of London	
Concerns about impact of Alfred Place on redevelopment of Estate	The proposals would not prevent redevelopment of the Estate and could benefit longer term development changes.
Concerns about impact of Alfred Place on ability for access by emergency services, taxis and deliveries	The proposals would permit emergency access at all times. Deliveries would be maintained via a service road at certain times of the day with loading bays provided on Store Street at other times.
Lack of proposals for management of park	Officers acknowledge the need for ongoing maintenance, subject to available funding.