



Our ref: 16/3725

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Dear Dr Batten,

**31 LONDON STREET, LONDON, W2 1DJ (WESTMINSTER CITY COUNCIL
PLANNING REFERENCE 16/09050/FULL)**

Further to your letter of 3rd April and the meeting that took place between the Trust, the London Ambulance Service (LAS), Jules Pipe, the GLA and TfL earlier this week. At this meeting it was agreed that it would be useful if I provided further information around the safety audit and technical assessment of the access road proposed by Great Western Developments (GWD) in connection with their Paddington Quarter development. I appreciate that this response does not cover all the points the Trust raised in this week's meeting, but I am currently speaking to GWD and Westminster council over these, including issues related to the Section 106, and I hope to be in a position to write to you to clarify these points in the next few days.

Firstly, I understand that you requested further information in relation to the brief provided by GWD's consultants WSP to Acorns Projects Limited and the subsequent scope of the audit. From discussions with WSP, I understand that this information has already been provided in a technical note dated 27th January 2017 and sent from WSP to Aecom. However, in case this is not the case, the note is attached with this letter, along with a copy of the audit itself. The email from WSP commissioning Acorns to undertake the project is attached at Appendix B of the note, and Annex A of the audit lists the documents made available to Acorns for the purposes of carrying out the audit. These are:

- Drawing 8427-SK-101 Rev G - Option 1 Two-Way Access Road Site Plan
- Drawing 8427-SK-111 Rev D - Proposed On-Street Parking Provision
- Drawing 8427-SK-120 Rev A - Winsland Street/Winsland Mews Servicing Visibility Splays
- Drawing 8427-SK-101-TR01 Rev G - Option 1 Two-Way Access Road 10m Rigid Swept Path Analysis
- Drawing 8427-SK-101-TR02 Rev G - Option 1 Two-Way Access Road 7.5T

- Box Van Swept Path Analysis
- Drawing 8427-SK-101-TR03 Rev G - Option 1 Two-Way Access Road 4.6T Light Van Swept Path Analysis
- Drawing 8427-SK-101-TR04 Rev G - Option 1 Two-Way Access Road Ambulance Swept Path Analysis
- Drawing 8427-SK-101-TR05 Rev G - Option 1 Two-Way Access Road 16.5m Artic Swept Path Analysis
- WSP | Parsons Brinckerhoff - Paddington Quarter Transport Assessment - September 2016
- Imperial College Healthcare NHS Trust - Letter from Dr. Tracy Batten (Chief Executive) to Sarah Whitnall, Development Planning, City of Westminster - 24th November 2016
- AECOM - Imperial College Healthcare NHS Trust: St. Mary's - Review of 31 London Street Planning Application Transportation Documents - 16th November 2016
- WSP | Parsons Brinckerhoff - Responses to AECOM Technical Note of 16th November 2016
- WSP | Parsons Brinckerhoff - Paddington Quarter - Speed Design Technical Note - 25th November 2016

The audit also confirms that a site visit was undertaken. We are therefore happy that the auditor was aware of the prevailing conditions, aware of the Trust's concerns and the use of London Street as a blue light access route to St Mary's Hospital (referred to in paragraph 1.2 of the audit) and for servicing, and that the audit was carried out in line with the relevant national standards. The standards are set out in Volume 5 Section 2 of the Design Manual for Roads and Bridges (Technical Note HD19/15), which is available at:

<http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol5/section2/hd1915.pdf>

I also understand that you requested a more detailed, point by point response to the eleven recommendations Aecom put forward in their technical note of 16th February. I apologise for not providing this before, but having spoken to DP9 in advance of preparing my previous letter I was advised that the Trust did not consider this necessary. The TfL position on each of the recommendations from Aecom is as follows:

- (a) Investigate the potential to relocate the entrance to the service yard for Paddington Quarter to the western end of the northern side of the building to create better separation between the northern end of the interim access road and the entry/exit point to the service yard. This will help to increase the level of visibility available from the service yard to other traffic using Winsland Street and London Street and improve forward visibility to the access to the yard.

As per the WSP response to the Stage 1 Road Safety Audit dated 5th December 2016, with the removal of the proposed loading bay to the east of the service yard on the southern side of the proposed access road, visibility splays of 2.4m x 17.7m

can be achieved (drawing 8427-SK-127). This meets the recommended minimum visibility standards set out in the Department for Transport's Manual for Streets 2, notwithstanding that the document also recognises that *'unless there is local evidence to the contrary, a reduction in visibility below recommended levels will not necessarily lead to a significant problem'*. Manual for Streets 2 is available at:

<http://www.ciht.org.uk/download.cfm/docid/055693F6-8DB0-4BBE-AA9FF1B5BC5E9412>

Implementing recommendation (a) would necessitate a new planning application, and would be likely to require significant amendments to the design of the scheme. Given that visibility meets the recommended standards, this is not considered to be necessary.

- (b) Increase the size of the service yard to adequately accommodate the level of demand anticipated and to ensure that no service vehicles would need to wait on street to service the site.

TfL initially queried the service vehicle trip generation presented as part of the application due to inconsistencies between the figures presented in different parts of the Delivery and Servicing Plan (DSP). These were subsequently clarified by WSP, and we can confirm that the figures presented in Table 4.2 of the DSP are correct and consistent with those used for other large scale office developments in central London. This level of service vehicle trip generation would necessitate six loading bays to accommodate the anticipated number of vehicles at peak times, and seven bays are proposed. In addition, service vehicle trips will be monitored and controlled through a Servicing Management Plan, secured by condition on the consent. As such, an increase in the size of the service yard is not considered necessary.

- (c) Remove the parking on the northern side of Winsland Street in the vicinity of where the interim access road meets Winsland Street. This will in turn allow a wider carriageway to be provided around the bend to provide a space for vehicles to wait to turn right into Winsland Street (east) and enable larger vehicles to complete the turning movement without over-hanging into the opposing side of the carriageway.

No tracking plots have been provided as part of the Aecom review note to allow us to determine the extent of any problem here. However, Westminster City Council have confirmed that changes to public on street car parking would be agreed by the appropriate Cabinet member as part of the detailed design process of the road. As such, they have agreed that if the Trust / LAS could provide evidence of their concerns at this point and if a safety issue can be demonstrated then this recommendation could be implemented at this point. However, Westminster's decision making process means that this is not something that can be confirmed either way at this early stage of design.

- (d) Ensure that no obstacles are placed on the south western side of the bend at the northern end of the interim access road to maximise the level of forward

visibility achievable. The removal of the northern most parking bay on the western side of the interim access road and the setting back of the northern most column would assist in this.

As per recommendation (a), forward visibility can be achieved around this corner in line with the recommended minimum visibility standards set out in Manual for Streets 2. Notwithstanding this however, it may be possible to make changes to the proposed layout to improve this visibility further, and TfL agree that this would be beneficial if possible. As such, Westminster have agreed to accept representations from the Trust with regards to the northern most parking bay when any decision is made on public car parking at a Cabinet level. In addition WSP / GWD have agreed that as part of the detailed structural design of the building they will look at options to relocate or remove the northern most column. However, these are not points that can be confirmed at this stage of the design and nor is this considered necessary to make the proposals acceptable.

- (e) The level of parking currently on Winsland Street and the buildings and functions located in the area mean that parking is in heavy demand. The relocation of parking away from the current Outpatients buildings is not considered desirable as this could limit access for mobility impaired patients and neither is the reduction in quantum of parking available. However, the current design for the interim access road includes several areas of concern in relation to parking including parking very close to the junction with Praed Street and at the northern end of the interim access road. To address the issue of parking it is suggested that SPG could investigate the potential for delivering some car parking within their site. This parking could be on a pay and display basis and would potentially facilitate the reduction in parking on roads surrounding the site.

Any proposals to provide public car parking of this nature would not be in line with the London Plan and would be resisted by TfL. The net loss of four pay and display parking spaces is not considered to be a significant issue.

- (f) Visibility from the Winsland Mews junction with the interim access road is likely to be restricted in the proposal due to the alignment of the junction in relation to the current Outpatient buildings. It is recommended that the alignment of the road is adjusted (i.e. the road is moved further west) to ensure sufficient visibility can be achieved.

Visibility in line with the recommended minimum visibility standards set out in Manual for Streets 2 can be achieved to the right for vehicles exiting from Winsland Mews. It is accepted that visibility to the left is more restricted. However, alongside the extract from Manual for Streets quoted in the response to recommendation (a), it should be noted that Winsland Mews is lightly trafficked, with only around 40 vehicles per hour using it in both directions at peak times and only around five vehicles turning right from it onto London Street (visibility to the left is predominantly an issue for right turning traffic).

Given that the Manual for Streets standards are a recommendation rather than an absolute requirement, the small number of vehicles that would be affected by restricted visibility to the south, and the fact that similar issues with visibility exist at junctions with the current layout of London Street (see attached photo showing current visibility to the right from Winsland Street), it is not felt that this would result in noticeable impacts when compared to the current situation. As such, this recommendation is not considered necessary to implement given it would require a complete redesign of the proposals.

- (g) The implementation of the interim access road will require the relocation of the bus stop currently located on Praed Street immediately to the east of the junction with London Street. The strategy to split these stops has been agreed with TfL. However, these stops are located in close proximity to the interim access road junction and are therefore likely to restrict visibility from the junction as well as restricting turning movements for larger vehicles. The bus stops should be placed outside of the visibility zone for the junction.

As per TfL, Westminster and WSP's previous correspondence on this point, the need for the bus stops to be relocated to ensure adequate visibility is accepted. However, this will be considered as part of detailed design given that the designs for the remainder of Praed Street are yet to be finalised and the current consultation on bus service changes in the Paddington area meaning it is currently unclear what level of bus service would need to be designed for.

- (h) Double yellow lines are currently provided on Praed Street in the vicinity of the proposed interim access road junction. The double yellow lines on the southern side of Praed Street have been observed to be used for servicing. It should be ensured that servicing is prohibited throughout the day when the interim access road is likely to be at its busiest to prevent large vehicle movements from being restricted.

This point is accepted by all parties and will be implemented as part of detailed design.

- (i) Whilst not shown in the concept design plans it should be ensured that an uncontrolled pedestrian crossing is provided across the interim access road where the road meets Winsland Street to facilitate pedestrian movements to and from the Outpatients Buildings. In addition to this, the footway on the southern side of Winsland Street to the east of the interim access road should be widened to a minimum width of two metres to provide a suitable pedestrian route between Paddington Station in the west and the Outpatients Buildings.

All parties have agreed that an uncontrolled pedestrian crossing can be considered at the detailed design stage once the final layout of on street parking and details of finishes, materials etc are understood. However, the width of the footway on Winsland Street (and indeed the layout of Winsland Street itself) is unchanged from the existing situation. Whilst TfL, WSP and Westminster all accept that the southern

footway on Winsland Street would benefit from being widened, it is not something that would be considered necessary to mitigate any impact from the development and in any case is not within GWD's gift.

- (j) Servicing of the linen store for the hospital currently takes place on Winsland Street through the use of 10m rigid vehicles. These vehicles have to reverse down Winsland Street in order to exit in a forward gear. The proposed interim access road will make reversing down Winsland Street more difficult and it is therefore recommended that linen deliveries are undertaken using smaller vehicles that could enter and exit Winsland Street in a forward gear.

Whilst this recommendation is supported, this appears to be within the Trust's gift to implement and has not been considered further by TfL.

- (k) An offset as small as 0.587m is shown between the interim access road and the rear of the Outpatients Building. Large vehicles turning between Winsland Street and the interim access road may overhang the threshold on the eastern side of the interim access road risking collision with the building. The interim access road should be realigned and the width of the threshold increased to reduce the likelihood of vehicle strikes with the building.

National standards for trunk roads set out in the Design Manual for Roads and Bridges (TD50/04) require a minimum clearance of 450mm from the edge of the carriageway to prevent damage by vehicles having a lateral overhang. As this standard is exceeded, increasing the width of the threshold is not considered necessary.

I trust that this is helpful and please let me know if you would like to discuss any of these points further or if you require any further information or documentation. I will write to you with respect to the Section 106 agreement by the beginning of next week.

Yours sincerely

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Copy to:

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London Ambulance Service – Andrew Grimshaw

DP9 – Oliver Sheppard, Steve Harrington