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Project name:
 St Mary's Hospital : Interim Access Road

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From: Justin Sherlock

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Technical Note

Subject: St Mary's Hospital, Interim Access Road

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Introduction

AECOM has been commissioned by Imperial College Healthcare NHS Trust to provide transport advice for the comprehensive redevelopment of the St Mary's Hospital site, located in Paddington, West London. This Technical Note (TN) provides a response to the Transport for London (TfL) letter to Dr Tracey Batten dated 4th May 2017 and the WSP | Parsons Brinckerhoff (WSP|PB) drawing reference 8427-SK-132 Rev B.

Road Safety Audit Procedure

A Stage 1 Road Safety Audit (RSA) was commissioned by WSP|PB on 24th November 2016 and completed by Acorns Projects Limited in December 2016. The terms of reference of this document are quoted within the Stage 1 RSA as being the Design Manual for Roads and Bridges (DMRB) HD19/15 'Road Safety Audit'. Whilst it is acknowledged that the DMRB only applies to trunk roads and motorways, there is no highway design standard in the UK for local roads. It is generally regarded however, that DMRB represents best practice for the rest of the highway network and in this context the advice provided in HD19/15 would represent best practice in the transport industry. Within London TfL have their own standard for RSA (SQA-0170). This standard applies to the Transport for London Road Network (TLRN) only. As the development proposals are contained to roads within the control of Westminster Council the use of HD19/15 appears reasonable.

TfL state in their letter that the RSA Brief is contained within the correspondence (Appendix B) of the WSP|PB TN dated 2nd February 2017. However, the correspondence in Appendix B appears to be just an e-mail instructing the audit team to proceed along with a series of design drawings and a link to the Transport Assessment. No formal RSA Brief therefore appears to have been prepared or issued to the audit team.

HD19/15 states in paragraphs 2.87-2.89 the requirements of a RSA Brief and an example of such a document is contained in Annex E. In addition, TfL's own standard for RSA also mandates the requirement of a RSA Brief and again an example of the requirements of this brief are outlined in Appendix C.

The absence of such a document makes it unclear what the scope of the RSA that was completed by Acorns Project Limited was. HD19/15 states in paragraph 2.89 that the brief should include, '*Clear identification of the elements of the scheme proposals included within the scope of the Road Safety Audit to be undertaken and also those elements of the scheme that fall outside of the scope, including strategic decisions. The Road Safety Audit Brief should clearly identify where the scope of the Road Safety Audit has been extended to allow consideration of strategic decisions.*'

In the absence of such a brief it is unclear whether the scope of the RSA included consideration of the alignment of the road and comparison between the existing access route to the hospital provided by London Street and that of the Interim Access Road. Whilst the RSA itself states, *'the new access road is intended to serve as the primary vehicular access route for the development and the Blue Light Route associated with the adjacent St Mary's Hospital,'* this statement fails to acknowledge that this route will also be the main servicing and general access route to the St Mary's hospital and the route used in a major incident event. It is therefore unclear whether the audit team have considered all user types that will need to utilise this link and the volume of traffic that it will carry.

The introduction to the RSA includes a description of the documents that were provided to the audit team. The audit team appear to have been provided with copies of the following documentation:

- Imperial College Healthcare NHS Trust Letter from Dr. Tracy Batten (Chief Executive) to Sarah Whitnall, Development Planning, City of Westminster (24th November 2016);
- The AECOM Imperial College Healthcare NHS Trust, St Mary's, Review of 31 London Street Planning Application Transportation Documentation (16th November 2016); and
- The WSP | Parsons Brinckerhoff Responses to the AECOM Technical Note of 16th November 2016.

It is unclear why such documentation would be provided to an independent road safety team. HD19/15 re-iterates the importance of the road safety audit team's independence. Paragraph 2.71 of HD19/15 states, *'It is a fundamental principle of the Road Safety Auditing process that the Road Safety Audit Team is independent from the Design Team. The Project Sponsor must not accept a Road Safety Audit Team where its independence from the Design Team is in doubt. In such cases, an alternative Road Safety Audit Team must be proposed.'*

In the absence of a clear brief and being in receipt of the various correspondence between WSP|PB and AECOM it is unclear whether the RSA has fully considered the development proposals.

Despite this, TfL state in their letter dated 29th March 2017 that they consider the road safe and that this is justified by the fact that a RSA has been conducted and a designer's response prepared that addresses the issues to the satisfaction of TfL. Based upon the lack of clear brief detailing the scope of the audit and the documentation that was provided to the audit team by WSP|PB, AECOM do not consider that the RSA was undertaken in accordance with the terms of reference quoted, namely HD19/15 and that the audit team could not have been truly independent.

In addition, the RSA was completed in December 2016 some time after the planning application was applied for and just before the application was taken to committee. HD 19/15 states in paragraph 2.58, *'A Stage 1 Road Safety Audit (or combined Stage 1 & 2 Road Safety Audit where there has been no preliminary design) must be undertaken before planning consent is applied for.'* As the audit was undertaken post-application it is unclear whether the procedure for conducting an audit as outlined in HD19/15 was followed and the result were fully reviewed and understood by the highway authorities before the planning application was taken to committee.

For these reasons the basis of the decision made by both TfL and Westminster Council to approve this interim access road layout appears to be flawed.

Response to TfL Comments on AECOM Recommendations

Following the initial response by TfL dated 29th March 2017 on the recommendations made by AECOM to assist in improving the design and safety of the proposals for the Paddington Cube a more comprehensive response has been outlined. Our response to the TfL comments are outlined below cross-referenced to the original comments raised.

A – TfL state that the level of visibility available from the proposed service yard at 2.4m x 17.7m (following the removal of the loading bay to the east of the access) meets the recommended minimum visibility guidelines as set out in the Department for Transport's Manual for Streets 2. Therefore there would be no requirement to relocate the service yard further west. This level of visibility has been determined based upon the existing speed of traffic on Winsland Street. It is difficult to see how visibility splays from the service yard could be determined based upon the existing speed of traffic on Winsland Street as this road will be fundamentally changed by the development proposals. Instead visibility splays should be based upon the design speed of the road proposed. The route will have a 30mph speed limit and therefore this would be an appropriate starting point for the design speed of the road. As such the visibility requirement in accordance with Manual for Streets 2 as cited by TfL as being the appropriate guidance would be 43m. However, acknowledging that the speed of traffic on the interim access road and past the service yard itself will be constrained by the two dog legs introduced. If the interim access road is to be a replacement for London Street, it is not unreasonable to expect this route to be designed to accommodate traffic at the same speed as the existing. Traffic surveys undertaken for the Trust in 2015 showed a seven day average all vehicle speed northbound of 19.14mph (85th percentile). Taking this speed would require a visibility splay of 23.5m. In addition, the seven day average top speed of all traffic recorded

on London Street in the survey northbound was 27.9mph. Considering this is a blue light route it is not unreasonable to assume that this is the speed at which emergency ambulances are travelling. This would require a visibility splay of 38.7m. The level of visibility from the proposed service yard is therefore inadequate and our recommendation to relocate it further west, appears the most suitable mitigation for this particular issue.

B – TfL state that they are content the service yard has been suitably sized to accommodate the volume of traffic anticipated and that movements will be controlled through a Service Management Plan. However, following the removal of the on-street loading bay it should be conditioned that all servicing takes place off-street to prevent congestion on Winsland Street occurring.

C – AECOM raised concern with the presence of parking at the northern end of the interim access road at the junction with Winsland Street. In response TfL have requested that AECOM provide tracking plots to demonstrate the extent of this issue. This would be for the applicant to undertake not AECOM. However, more importantly this appears to ignore the concern raised, which for clarity is that vehicles manoeuvring into and out of these spaces would prevent a vehicle from being able to enter the eastern section of Winsland Street from the interim access road. This would then in turn block the interim access road and cause congestion. The congestion has the potential to delay emergency service vehicles on route to the hospital which is unacceptable. The recommendation that the parking layout will be reviewed at detailed design is not sufficient. This is a significant issue with the design presented and requires a suitable solution prior to consent being granted. If, at detailed design it is found that the parking cannot be accommodated in this location, there is the potential that parking would have to be omitted which would have a detrimental impact on the day to day operation of the hospital. This situation would be unacceptable and therefore requires resolution now.

D - AECOM raised concern with the presence of the northern most parking bay on the western side of the interim access road and the column which both will limit forward visibility around the bend for northbound traffic. As stated in response to item A the design speed assumed by WSP|PB is insufficient given the purpose of this route and the type of vehicles it will carry. Forward visibility is therefore inadequate and the design unacceptable. It is welcomed that WSP|PB have agreed to review the provision of this parking space and the column location but the fundamental concern remains. These items should be removed from the design. If this is not possible, the interim access road in its current form is sub-optimal to the existing situation and should not be progressed.

E – AECOM recommended that parking is considered on the Paddington Cube site to mitigate the potential loss on-street and the detriment this will have to the operation of the hospital. TfL dismiss this as being contrary to policy and on the grounds that only four parking spaces are being lost. However, the total volume of parking that will be lost as a result of the development is not known at this stage. If, as AECOM have previously highlighted, the loss of parking could be much greater once the review at detailed design has taken place, this need for alternative parking could become greater. The provision of parking on the Paddington Cube site would not be contrary to Westminster Council policy and should therefore be explored.

In addition, the parking proposed on the western side of the interim access road close to the Praed Street junction should be removed.

F – AECOM have highlighted the inadequate visibility from the Winsland Mews junction with the interim access road and the road safety issue this presents. TfL have dismissed this on the basis that the volume of traffic using this link is low. It is poor practice for a new highway to be designed with a clear road safety constraint, especially given the significance of this link. This issue could easily be rectified by realigning the road further west as recommended by AECOM. If this is not possible, the interim access road in its current form is sub-optimal to the existing situation and should not be progressed.

G – The implementation of the interim access road will require the relocation of the bus stop on Praed Street. TfL have agreed the location can be confirmed at detailed design. AECOM are content that this can only be addressed at detailed design but would seek to ensure that sufficient visibility from the access is guaranteed.

H – Double-yellow lines should be extended to the east on the southern side of Praed Street along with the no loading restriction to ensure that access to the interim access road remains clear at all times. The plan prepared by WSP|PB indicates an extension to the no loading restriction but not the double-yellow lines. Both need to be extended to the east.

I – The provision of an uncontrolled crossing at the northern end of the interim access road should be provided along with a footway on the northern side of Winsland Street east of the interim access road. It is welcomed that the uncontrolled crossing will be incorporated into the detailed design. The footway widening could be provided by the developer under a section 278 agreement by narrowing Winsland Street. This should be secured by condition.

J – Servicing of the linen store by smaller vehicles to enable them to enter and exit in a forward gear. The need for this measure is created by the Paddington Cube development and as such any cost implication of this should be funded by the developer and secured through the S106 agreement.

K – The offset between the carriageway of the Interim Access Road and Outpatients Building is as small as 0.587m. Once boundary lines are taken into account it is considered that the lateral clearance that remains within the highway will be less than 450mm. As such this design is insufficient and the carriageway of the interim access road should be relocated further west.

Conclusion

AECOM have identified a number of issues with the process by which the Stage 1 Road Safety Audit was undertaken. In the absence of a clear brief and the audit team being in receipt of the correspondence between WSP|PB and AECOM it is considered that the audit has not been undertaken in accordance with the terms of reference, is not independent and therefore this document should not have been used to inform the decision making process of Westminster Council and TfL.

Whilst AECOM have identified a number of design issues with the interim access road and provided a number of recommendations the TfL response still fails to acknowledge the potential cumulative impact these issues could have and the overall sub-optimal nature of this proposal when compared to the existing situation. It is the view of AECOM that the interim access road would leave the hospital with an inferior access arrangement to the current use of London Street that would affect the operational efficiency and safety of traffic using that route. This is unacceptable and further consideration should be given to the measures recommended.

The drawing prepared by WSP|PB to identify the areas of change from the planning application requires some further amendment to reflect the recommendations that have been made.



DO NOT SCALE

KEY

-  PLANNING ARRANGEMENT
-  PROPOSAL FOLLOWING RSA DESIGNERS RESPONSE
-  PEDESTRIAN FACILITIES TO BE REVIEWED AT DETAILED DESIGN STAGE

NOTE

1. AT THE DETAILED DESIGN STAGE OF THE PROJECT, A NEW SYSTEM OF STREET LIGHTING / STREET LIGHTING INSTALLATION WILL BE DESIGNED TO SUIT THE PROPOSED HIGHWAY WORKS.

REV	DATE	BY	DESCRIPTION	CHK	APD
B	08/05/2017	CRJB	UPDATED FOLLOWING COMMENTS	MWP	MWP
A	04/05/2017	CRJB	FIRST ISSUE	MWP	MWP

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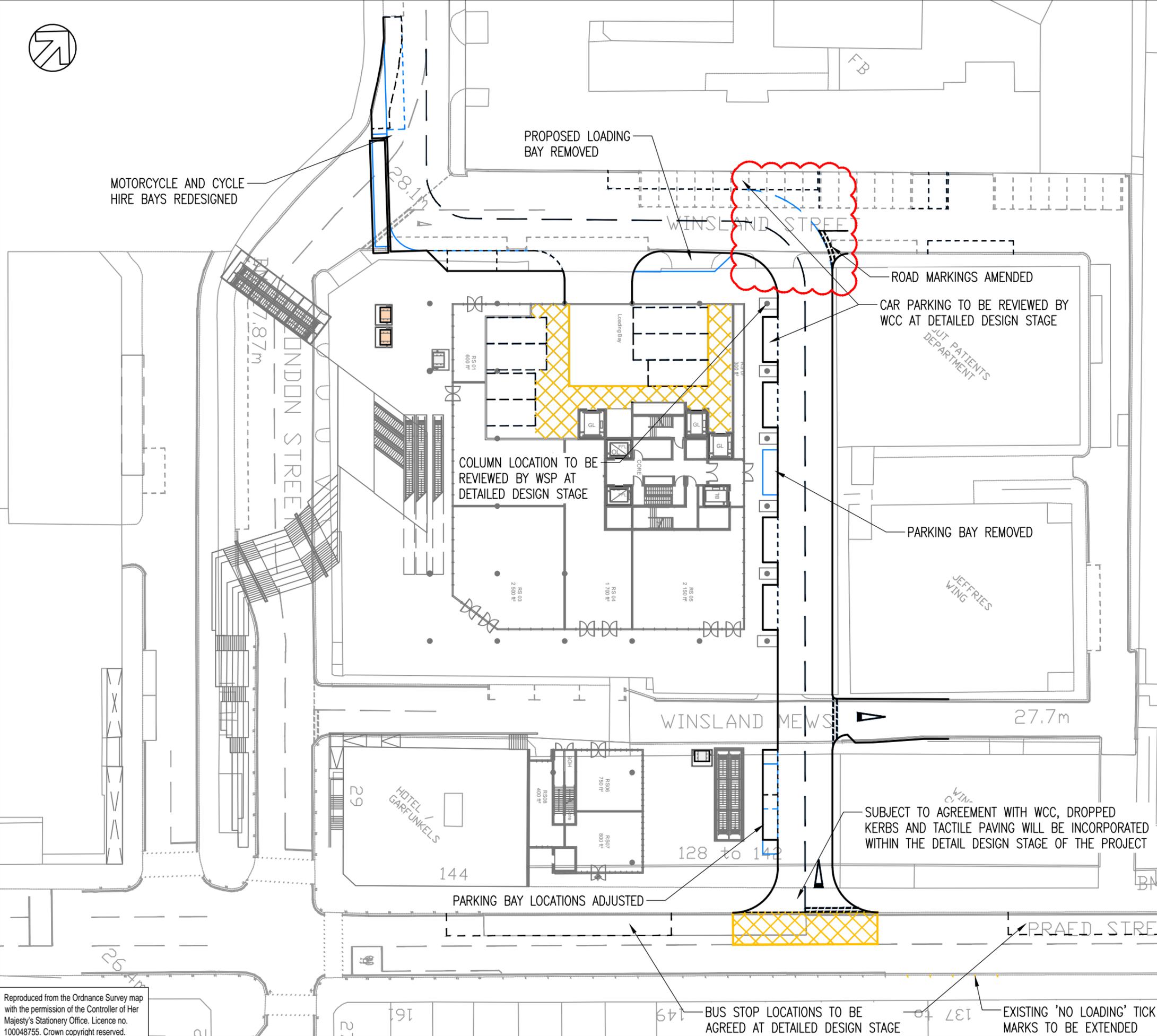
ARCHITECT: RPBW

PROJECT: ROYAL MAIL PADDINGTON (RMG), PADDINGTON

TITLE: COMPARISON BETWEEN PLANNING APPLICATION AND PROPOSAL FOLLOWING RSA DESIGNERS RESPONSE

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