

David Shiels

Subject: FW: New City Court, St Thomas Street - 18/AP/4039
Attachments: SS100838.JPG; SS100855.JPG

From: Hiley Andrew [<mailto:Hileyan@tfl.gov.uk>]
Sent: Friday, August 28, 2020 6:59 PM
To: Crosby, Victoria
Cc: Crane Anne; Calver Danny (ST); Andrew Russell
Subject: RE: New City Court, St Thomas Street - 18/AP/4039

Dear Victoria

Further to your request for comments on the 'Consolidation of deliveries independent review' (January 2020) report to support the New City Court planning application, please find below our comments.

As was set out in the Mayor's Stage 1 report, TfL was and remains very concerned about the proposed servicing arrangements for the proposed development. Both the use of St Thomas Street (TLRN) for HGV servicing and of White Hart Yard for LGV servicing raises Healthy Streets and Vision Zero accident reduction policy implications. Although White Hart Yard is a borough road, vehicles need to cross and access from Borough High Street (TLRN) incurring potential pedestrian conflict at junctions with totally unsatisfactory sightlines.

The proposal for aggressive consolidation is generally a step in the right direction and we welcome that the applicant has commissioned this work. The headline result is encouraging for the proposed loading bay in St Thomas Street, however fundamental concerns remain and, further, there has been a material change of circumstance since Stage 1 report, which I explain below. And, most obviously, the review relates to a pre covid-19 baseline.

Detailed comments on the review are:

- There is no information on who the likely retail tenants will be, and what their requirements are versus what the landlord can offer. Other recent mixed use commercial/retail schemes in planning/approved in the London Bridge area have not required HGV servicing, so why does this development?
- Page 2 bullet 3 – which are the GPE sites being compared with? Details have not been given, how many, where etc. Which week was surveyed – was this typical ?
- Page 2 bullet 5 – a 70% reduction in service vehicle movements is obviously good and generally in line with what we have asked for previously, but there is still a post-consolidation impact that needs to be collectively managed, both on St Thomas Street and Borough High Street. We welcome that loading is not planned in the peaks or lunchtime periods. Both the cap on the numbers of vehicle movements and restricted times of day will need to be secured via condition/obligation, with an appropriate monitoring and review regime agreed with TfL and the council, and funded by the developer, should the application be approved (although see comment below about controlling on-street servicing bays)
- Page 3 – the plan appears to show a cycle hire docking station on St Thomas Street, but this has yet to be agreed with TfL. More fundamentally the plan does not show a contra-flow cycle lane that would be highly desirable with narrowing of St Thomas Street to a single lane as shown on the plan – this is important in terms where a loading bay may be sited. The location of the loading bay shown on the plan has not been agreed with TfL.
- Page 4 – overall combined results showing an overall reduction of 88 vehicles or 70% reduction, leaving 38 vehicles, is clearly welcomed, however there is no detail of where the remote freight consolidation site may be and consequent impacts on the network in that location.
- Page 7 and more generally - a key issue is that TLRN on-street loading bays are not bookable and anyone can use them at any time within the hours of operation/length-of-stay restrictions. If this changes, this is outside the scope of this current development project and would be a wider piece of work, but currently we cannot guarantee that bays will be available on highway, whereas on private land such as at Guy's Hospital

this is achievable. This could have implications for monitoring and management of the servicing vehicles associated with the development.

- Page 7 – references a loading survey but does not give much detail – date, period, infringements etc. Who are the third parties they have engaged with ? This needs more detail.
- Page 8 – related to the point about the limitations of management of on-street servicing bays, what about the requirements of other users on the on-street loading bay – particularly the Bunch of Grapes PH, and others? It will be very difficult, if not impossible, to target only servicing vehicles associated with the New City Court development in terms of controlling hours, without affecting other business, possibly unfairly.
- Page 8 – shows overnight servicing which we generally are trying to encourage across London, so could they do even more? Elimination of day time servicing would be a clear mitigation, reducing the potential conflict with pedestrians and cyclists to a minimum.
- Page 8 – Use of zero emission vehicles is welcomed, but monitoring and enforcement will be difficult. Other requirements would include Direct Vision Standard vehicle compliance, FORS registered delivery companies etc
- Page 10 – specialist drivers noted, but it depends on who the contractors are. Can this be enforced ?
- Page 10 – specialist booking system noted, we welcome the idea, but, as mentioned above, currently it not possible on a public highway in terms of Traffic Regulation Orders etc,
- Page 11 – states electric vehicles ‘can’ be used, not ‘will’ be used – we would expect this requirement to be ‘locked in’ to any subsequent planning approval, to meet Carbon Reduction targets, although again enforcement may be difficult, perhaps using ANPR ?

Notwithstanding these comments, as stated above, there has been a material change of circumstances since Stage 1 report was issued, namely the Covid-19 pandemic and associated social distancing requirements and walking and cycling-led recovery plan (e.g. the London Streetspace Plan – LSP).

Pre covid-19, TfL was progressing a ‘Healthy Streets’ scheme for St Thomas Street, which would see a single eastbound carriageway, wider footways and a contraflow westbound, south-side cycle track to allow two-way cycle access along the length of St Thomas Street, a movement which isn’t possible now. A key difficulty we have always had in design work is accommodating these wider footways and a contra-flow cycle lane around existing requirements in the street and of other users requirements such as the pub. The proposal for HGV servicing on St Thomas Street has compounded this difficulty and to date we have not been presented with a possible design solution.

Currently the loading bay at the existing New City Court building in St Thomas Street, and those nearby in Borough High Street, have been suspended as part of the LSP temporary measures. The photographs attached, taken by my colleague David McKenna (taken on a Sunday morning on 14 June 2020, very early on in the post-lockdown period, so quiet, atypical conditions) show the current layout. The covid-19 pandemic has reinforced our aspiration to continue to improve walking and cycling in this area. The temporary scheme will need either to be consulted on and made permanent or withdrawn by around November 2021. We may consider making some amendments to re-introduce some loading, depending on local feedback.

Given the above, we would need to be convinced that an on-street loading solution in St Thomas Street for the New City Court development, regardless of the degree of consolidation, is workable and will not preclude our plans for St Thomas Street. As I said above, we have yet to see a plan that shows this, at least in terms of physical layout. Regardless of the layout, there is still a safety risk and inconvenience to other road users associated with goods being trolleyed across the footway and, very likely, a cycle track also.

We still believe that not enough work has been done to investigate and/or discount the potential for an off-highway loading bay accessed from St Thomas Street. Although this would introduce a crossover and hence a pedestrian and possibly a cycle conflict, and would preclude HGV servicing, it would make deliveries more secure and safer and would be easier to monitor, manage and control. It could also negate the need to use White Hart Yard, overcoming the safety concerns there, and would comply with council policy that seeks off-street servicing in all new developments.

So the conclusion on servicing is that we welcome the efforts to reduce and control vehicle movements through consolidation and time-of-day restrictions, but that we still have fundamental concerns regarding the suitability and

deliverability of the proposed servicing arrangements in terms of Healthy Streets, Vision Zero and future aspirations for the area, particularly in the context of post-pandemic recovery.

I thought I would take this opportunity to update you on some of the other issues raised at Stage 1, in particular the mitigation package we would seek, should the application be approved.

I understand London Underground (LU) remain keen on the potential for opening up a new east-facing entrance in the Borough High Street LU ticket hall, subject to engineering feasibility and commercial terms. Delivery of this entrance, at no cost to TfL, should be a requirement of any subsequent planning approval, as it will reduce pressure on footway on Borough High Street and help spread the development's LU trip demand away from the more congested main LU ticket hall.

A contribution to the St Thomas Street Healthy Streets scheme is still considered appropriate, not least as it would allow direct cycle access to the site in both directions on St Thomas Street which is not possible at the moment, and would provide more footway space adjacent to the development akin to the current LSP layout. There are five major planning proposals in the St Thomas Street area (Bermondsey Snowsfield, Vinegar Yard, Becket House, Capital House and New City Court) that would benefit from the Healthy Streets scheme, so it would seem equitable to apportion the scheme's cost, currently estimated at £5.5m, between the five developments. New City Court is the largest of the developments, in terms of trips and floorspace, and represents about a third of the total development using both these measures. As such, a contribution of £1.8m is considered appropriate.

We would expect a new cycle hire docking station to be funded, as a cost of £220,000, to provide alternative access options – cycle hire playing a key role in post-pandemic recovery - as well as a £20,000 contribution to a local Legible London sign expansion/refresh. Please refer to the Stage 1 report for other requirements related to cycle parking, construction logistics, LU infrastructure protection and the travel plan.

I hope you find these comments useful and trust you will consider them fully in your determination of the application. In the meantime, please let me know if you have any further comments or questions.

Regards
Andrew

Andrew Hiley | Principal Planner (Spatial Planning) | TfL City Planning
Transport for London | 9th Floor, 5 Endeavour Square, Westfield Avenue, E20 1JN
Telephone number: 020 3054 7032 (auto 87032)
Mobile number: 07545 200056 | Email: andrewhiley@tfl.gov.uk

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