

## New City Court

### TfL public consultation

1. This Note addresses the 'live' consultation that TfL has submitted to the Inspector in relation to potential changes to Borough High Street, St Thomas Street and London Bridge. It has been prepared for the public inquiry and is separate to any representations that may be made to TfL in response to the consultation.
2. The comments below only relate to the 'Borough High Street' elements of the proposals, which include St Thomas Street.
3. This note is divided into 3 sections:
  - Overview of the proposals and general comments, including impacts on the existing situation.
  - How the proposals would relate to the 2018 scheme
  - How the proposals would relate to the 2021 scheme

### Overview of proposals

#### Footway widening on St Thomas Street

4. Whilst the emergency scheme provided additional footway width to allow for social distancing, we assume the new experimental proposals are proposed to increase the footway width to provide a more pleasant environment for pedestrians and reduce footway congestion in line with the Healthy Streets approach. It is therefore surprising that the proposals do not extend to the junction of Borough High Street, where people congregate waiting to cross on the signalised crossings, and the two pedestrian flows meet. This area remains narrow and unimproved limiting the effectiveness of the proposals.
5. The indicative design drawings relating to the proposals note that the existing parking and taxi bays were removed as part of the emergency scheme, but do not identify the 'existing' loading bay or confirm that it has been removed.
6. Paragraph 30 of TfL's objection letter (CDC.24) stated that for the 2018 scheme:
 

*"The loading bay cannot be dedicated to one user, so may not be available at the time required. This scenario would result in unlawful waiting and potentially blocking on St Thomas Street and/or additional HGV movements in an area of London that has a very restricted road network for HGV 'turns and high cycle and pedestrian movement."*
7. Given that TfL highlighted the above potential impact when the servicing bay is not accessible it would be useful to understand how the existing properties on the western end of St Thomas Street are expected to be serviced under these experimental proposals where there is no loading bay or other servicing provision being provided as part of this long term proposal.
8. We assume that the service vehicles that previously used the loading bay on the southern side of St Thomas Street are expected to stop in the parking bays on the opposite side of the road if there is available space, and then trolley their goods across the carriageway and the widened footway to access the existing buildings. This is the same as the existing emergency scheme, but is no longer to deal with the Covid-19 emergency and therefore

represents a long term worse situation for the delivery drivers, other road users and pedestrians than the proposals that TfL raised concerns about in relation to the 2018 scheme.

9. Alternatively, smaller vehicles may choose to service some of the buildings from the yards, as they will be able to stop and unload more easily from this location given that no provision is being provided on St Thomas Street. This will result in an increase in vehicles using the yards, which is counter to TfL's arguments regarding safety issues and a desire for no increase in vehicles using the yards.

#### Footway widening on Borough High Street

10. Heading South, the kerb build out disappears just before the pedestrian crossing on Borough High Street, requiring people to move back onto the existing footway. People waiting to cross the road at the signalised crossing form a congestion point which is exacerbated by the funnelling of pedestrians in this location. This arrangement retains the existing longer crossing distance than would have been required if the widening had continued past the crossing and the White Hart Yard access.
11. The loss of the servicing bays on Borough High Street is not mentioned on the plans.

#### TfL's success criteria

12. The public consultation 'Walking and Cycling criteria' notes that TfL want to ensure that "*Pedestrians are not disadvantaged by the scheme*". There is no mention of not disadvantaging cyclists presumably because the scheme removes the previous two-way route along St Thomas Street worsening cycle connectivity.
13. The 'Business and Residents criteria' confirms that "*Businesses can continue to make and take deliveries*". It is unclear how this can be achieved from the surrounding TfL Red Route following the removal of the 'existing' loading bays.
14. TfL have suggested that they might undertake a survey to ensure that there is sufficient provision, but this would not take into account the increased trolleying distances, which TfL have previously noted that they are averse to.

### **Impact of proposals on 2018 scheme**

15. With minor alterations the footway widening experimental scheme could accommodate the 2018 proposals. This would require the relocation of a small number of cycle stands and the provision of a loading bay on the widened footway close to Keat's House.
16. The footway widening on Borough High Street, in the vicinity of the White Hart Yard access, would make the left in manoeuvre easier as it positions the vehicle better for the turn.

### **Impact of proposals on 2021 scheme**

17. With minor alterations the footway widening experimental scheme could accommodate the 2021 proposals. This would require the relocation of a small number of cycle stands to provide a crossover close to Keat's House.
18. Vehicles would still be able to access the development in a similar arrangement to the submitted proposals.