

THE HONOURABLE SOCIETY OF THE INNER TEMPLE

DIRECTOR OF PROPERTIES: R.J. SNOWDON FRICS

SURVEYOR'S OFFICE, THIRD FLOOR, 6 KING'S BENCH WALK, INNER TEMPLE, LONDON EC4Y 7DR



Dear Madam,

Associated Proposals - North South Superhighway - Ref: DBE/CT/PA.

We have picked up the details from the City of London website, dated 7 September 2015, for the proposals associated with the creation of the north/south cycle superhighway on behalf of Transport for London, which proposes to make orders under section 6 of the Road Traffic Regulation Act 1984.

Transport for London proposes to introduce a north-to-south cycle superhighway in the City of London. Of the proposals listed to facilitate the operation of that superhighway we have strong objections to the following -

Inter alia, it is proposed to:

- 1. Prohibit motor vehicles entering or leaving Tudor Street at its junction with New Bridge Street.
- 2.
- 3. Restore two-way working for vehicles in Bridewell Place.
- 4.
- 5.
- 6.

The reasons for the objection are as follows:

1. <u>Prohibit motor vehicles entering or leaving Tudor Street at its junction with New</u> <u>Bridge Street</u>

Tudor Street is the **only** access route for vehicles visiting the Temple. The Temple is occupied by the Honourable Society of Inner Temple and the Honourable Society of Middle Temple, and houses a large number of Barristers' Chambers employing in excess of 2,500 people across both sites. It is stressed again that Tudor Gate, at the western end of Tudor Street, is the **only** vehicular access point to the Temple.



The resident businesses receive numerous deliveries throughout the day, in vehicles of various sizes The Inn's themselves, as part of the requirement to preserve and maintain the fabric of the buildings (mainly listed and all within a Conservation Area) undertake annual preventative maintenance requiring scaffolding, which can only be delivered by articulated lorry. The proposed closure of the junction of Tudor Street with New Bridge Street – and the proposal of using the narrow, right-angled Bridewell Place as an alternative - will cause great difficulty for the larger vehicles sending them into the oncoming carriageway in order to negotiate the turn. This will result in real difficulties for the running of the Temple as a thriving and world class employment centre for the legal profession. The creation of a traffic light controlled junction at the Tudor Street and New Bridge Street intersection, allowing exit to northbound and southbound carriageways, and the closure of the junction of Bridewell Place with New Bridge Street would seem to be a more sensible alternative, and avoid large vehicles having to negotiate the right angled turn within Bridewell Place.

3. <u>Restore two-way working for vehicles in Bridewell Place.</u>

As above, the utilisation of a narrow, right angled turn carriageway will place undue restrictions on the vehicles visiting the Temple from New Bridge Street.

These proposals could do untold damage to the daily life of the Temple, which the City of London appears to hold in high regard. It is urged that this is rethought in line with the suggestion above, so that this does not happen.

I would be grateful to be kept informed on any proposals relating to the City of London's consideration of this matter by email to

Yours sincerely,



THE HONOURABLE SOCIETY OF THE MIDDE Carolvn Dwver Director of the Built Environment Guildhall London

Estates Office Carpmael Building Middle Temple Lane London, EC4Y 7AT



25th September 2015

Dear Madam,

EC2P 2EJ

Associated Proposals - North South Superhighway - Ref: DBE/CT/PA.

I write in respect of the proposals by Transport for London to create a North-South cycle superhighway through the City of London. In order to facilitate this project, we understand that the proposal involves some drastic modification to the traffic flow on some routes.

You will be aware that my colleague, Richard Snowdon at Inner Temple, has already written to you setting out in detail the devastating effect the changes will have to the operation of the two Societies and I wish to add our strong support to the objections raised. It should also be noted that Tudor Street provides the only viable means of access for firefighting tenders and as such the proposal to restore two-way traffic flow to Bridewell Place, with its restricted turning capacity, could have a detrimental effect in an emergency.

The proposal put forward by Richard Snowdon to install traffic lights at the intersection of Tudor Street with New Bridge Street presents a logical solution and we hope that this is adopted so as to preserve the current access arrangements into the Temple.

Thank you for your assistance in this matter.

Yours faithfully,



IAN GARWOOD DIRECTOR OF ESTATES

The Honourable Society of the Middle Temple, Estates Office, Carpmael Building, Middle Temple Lane, London EC4Y 7AT T: 020 7427 4840 www.middletemple.org.uk

From:	Lightfoot, Gerry
Sent:	17 December 2015 16:53
То:	Lightfoot, Gerry
Subject:	FW: PRO FW: City of London Enquiry COL:04354175

-----Original Message-----From: donotreply@cityoflondon.gov.uk [mailto:donotreply@cityoflondon.gov.uk] Sent: 06 October 2015 15:11 To: PRO Queue Subject: City of London Enquiry

Dear Contact Centre,

A new enquiry has been received on 15:10:23 06 Oct 2015, details are below:

Customer's Name: Mr Richard Massett Customer's Email:

Subject: Associated Propsals - North South Cycle Superhighway - Ref: DBE/CT/PA Nature of enquiry: Dear Sir

We would like to register an objection to the proposals to Prohibit motor vehicles entering or leaving Tudor Street at its junction with New Bridge Street and to Restore two way working for vehicles in Bridewell Place.

This is on the grounds that Bridewell Place is to narrow to safely accommodate two way traffic particularly as vehicles would have to negotiate a tight right angled turn in doing so. The street is busy with traffic much of which is made up by vehicles servicing premises within the Temple. The traffic includes some large articulated vehicles. In our view it would be very much preferable to construct a safe signalised junction at Tudor Street with New Bridge Street to avoid traffic having to use the less suitable Bridewell Place.

Yours Faithfully

This representation is made on behalf of the Licensed Taxi Drivers Association.

Form Reference: GE73109

Please action.

Thank you

From:	PLN - City Transportion
Sent:	18 December 2015 10:42
То:	Lightfoot, Gerry
Subject:	FW: ref DBE/CT/NS CSH 2: North-South Cycle Superhighway Consultation

This was sent to the citytransportation@cityoflondon.gov.uk email address

From: Jasper Warwick Sent: 17 December 2015 23:54 To: PLN - City Transportion Subject: ref DBE/CT/NS CSH 2: North-South Cycle Superhighway Consultation

I wish to object to the closure of the junction of Tudor Street and New Bridge Street. It will lead to chaos for deliveries to the Temple. It would make far more sense to retain the Tudor street junction and expand it so that traffic can exit and entre from both the north and south.

I will refrain from pointing out that millions of pounds have been spend only two years ago redesigning the junction opposite Blackfriars which if this new work is to be carried out will be completely wasted.

Jasper Warwick



Members' Room



Gerry Lightfoot, Traffic Order Officer

Department of the Built Environment

City of London Corporation

Objections to the Proposals to close Tudor Street as part of the new Cycle Super Highway on New Bridge Street EC4

I am writing to object on behalf of my constituents in the Inns of Court of Inner and Middle Temple who will be detrimentally affected by the current proposals to close Tudor Street into and out of New Bridge Street.

The barrier controlled main entrance to the Temple complex is at the western end of Tudor Street and is used by large scale delivery vehicles. The Bridewell Place alternative given in the consultation document is woefully inadequate, being too narrow for the proposed two-way traffic stream, even with some pavement reduction, and the acute right-angled bend will create, at the very least, altercations and at worst, head-on collisions.

That Tudor Street is to be closed off to facilitate the creation of a narrow island bus stop has been described as `insane' and I tend to agree. To place alighting or waiting bus passengers between two fast moving cycle lanes on the one hand and one of the most congested routes through the City on the other, would be extremely dangerous especially as little provision is being made for bus passengers to cross the cycle lanes. Moreover the width of the proposed bus stop island will soon prove insufficient for the many workers alighting or more particularly waiting for a bus. The Chairman of Planning and Transportation has been working hard to improve road safety to bring down the incidence of road death and serious injury. I feel this proposal will be a serious set-back to his endeavours. As Chairman of Port Health and Environmental Services, I am responsible for air quality and the position of this bus stop flies in the face of all we are doing to protect the residents and workforce from the unhealthy and life threatening effects of pollution and poor air quality by advising at all times to walk as far from the kerb as possible and to take quiet routes.

I urge you to take account of the strong feeling against this proposal and find a compromise that will be more satisfactory to residents and workers in the Temple but more importantly will not put lives at risk.

Yours sincerely



Wendy Mead OBE CC

Chairman, Port Health and Environmental Services Committee

From:
Sent:
To:
Subject:

Lightfoot, Gerry 07 January 2016 14:22 Lightfoot, Gerry FW: 'North-South Cycle Superhighway

From: Charles Samek Sent: 17 December 2015 15:40 To: PLN - City Transportion Subject: 'North-South Cycle Superhighway

Dear Sir / Madam,

I wish to **object** most strongly to the proposed road changes as outlined in your letter of 10/12/15 to Mr R Snowdon. The proposed changes are completely unworkable and would cause traffic to pass down streets which are wholly unsuited to the flow proposed.

Moreover, the changes are unnecessary for the safe and proper functioning of the highway and would cause tremendous inconvenience to road users and result in much heavier traffic congestion down Fleet Street and result in unnecessarily longer journeys with the attendant increase in omissions.

Yours sincerely,

Charles Samek Q.C.

This message has been scanned for malware by Websense. www.websense.com

From: Sent: To: Subject: Lightfoot, Gerry 07 January 2016 14:24 Lightfoot, Gerry FW: 'North - South Cycle Superhighway'

From: Geoffrey Hamer Sent: 01 January 2016 18:31 To: PLN - City Transportion Subject: Re: 'North - South Cycle Superhighway'



1st January, 2016.

Your ref. DBE/CT/NS CSH 2

Dear Mr Simmons,

Thank you for your consultation letter of the 10th December, 2015, concerning your proposals for adversely affecting traffic flow in the Tudor Street area. As a resident and council tax payer, I have examined your proposals and find them largely unacceptable. For example, if there is to be no access for motor vehicles from New Bridge Street into Tudor Street, the carriageway island in Tudor Street no longer serves any useful purpose!

While I appreciate that your policy is exclusively for the benefit of cyclists, they represent only a small fraction of road users in the Tudor Street area and, accordingly, there must be consideration shown to others, particularly pedestrians and motorists, i.e., the majority of users. Clearly, the closure of the New Bridge Street / Tudor Street entrance-exit and the Temple Avenue / Embankment exit to motor vehicles will contribute to grid-lock in the area. Further, the entire area to the south of Fleet Street is totally devoid of pedestrian crossings! So much for pedestrian safety! Furthermore, in recent years both Bouverie Street and Carmelite Street (from Tudor Street to Fleet Street) have been made one way streets for motor vehicles, but two way for bicycles, thereby giving cyclists priority over all other road users, particularly pedestrians, at the corners on Tudor Street. This regularly places pedestrians in danger from cyclists exercising their right to ride against the traffic flow/direction.

Hence, I suggest that pedestrian crossings be established on all corners in the area, including the entrances to both Cycle Super Highways and that these crossings be traffic light controlled and with indication that crossing rules also apply to cyclists.

I trust that my comments will assist you in your deliberations and I look forward to a satisfactory outcome with respect to your consultation.

Yours sincerely,

Geoffrey Hamer, Ph.D., C.Eng.

From:	PLN - City Transportion
Sent:	04 January 2016 14:53
To:	Lightfoot, Gerry
Subject:	FW: North South Cycle SuperHighway
Importance:	High

From: Desiree Artesi Sent: 04 January 2016 14:42 To: PLN - City Transportion

Subject: North South Cycle SuperHighway Importance: High

Statement of Objections and Grounds

Dear Carolyn Dwyer, Director of the Built Environment,

I am a resident and practising barrister of the Inner Temple. I write further to the letter/email dated 10 December 2015 from Steve Pesland (Transport and Public Realm Director), and Iain Simmons (Deputy Director – Built Environment) respectively, regarding the proposed changes in respect of which the Statement of Reasons are:

"The introduction of the additional waiting and loading restrictions will assist traffic flow in the streets and at the junctions by preventing obstructive deliveries and parking.

The amendments to the parking places will assist goods vehicles to negotiate certain turns within the area while remaining fully on the carriageway."

Whilst it is right that the removal of obstructive parking and deliveries does assist traffic flow, I am concerned that the proposals as they stand will in fact have the effect of making deliveries to residents in the Inner Temple impossible. In particular,

"the replacement eastern access route would be via Bridewell Place. This is a narrow street, with a right-angled turn, which they would make a two-way street. This would involve larger vehicles having to negotiate three right-angled turns from New Bridge Street into Tudor Street and involve the crossing of the carriageway into Tudor Street. This is considered wholly unsuitable. Additionally, the Corporation of London advocate Bouverie Street as an alternative access route from the north. This is also narrow, and often further constricted by parking for the Polish Embassy, a disabled parking space and the cycle hire stands. No proposals have been received which shows any proposed alteration to these constrictions."

Could you kindly consider how you could perhaps address this oversight? I am sure that a transport assessment and travel plan in keeping with Core Stategy CS16 would reflect this.

Kind regards,

citytransportation@cityoflondon.gov.uk

'North-South Cycle Superhighway'.

To the Director of the Built Environment - Reference DBE/CT/TMO-GL

I am a resident in the Inner Temple and work in Salisbury Court.

I am Chair of the Temple Residents Association. By reason of the very short period of consultation (the consultation letter was dated 10th December 2015 and requires a response by 6th January, notwithstanding the Christmas and New Year period) there has not yet been an opportunity for the TRA Committee to consider the proposals.

The vehicular access for both Inner and MiddleTemples is via Tudor Street. This includes a substantial number of delivery vehicles for business and residential use and daily refuse collection by a number of vehicles. The Inns accommodate several thousand barristers and over 100 residential flats, as well as being the headquarters of the aforementioned Inns of Court (administrative offices, dining halls, meeting rooms, 2 substantial libraries, gardens where large-scale functions are often held, the Temple Church).

It is understood that the present proposals flow from an intention to close off the current access/egress from New Bridge Street into/from Tudor Street to accommodate the north-south cycle superhighway

I object to the following proposals (I refer to the numbered paragraphs in the Notice) in particular (but not only):

"3. It is proposed in:

(a) **Bouverie Street** to introduce 'at any time' waiting and loading restrictions extending from the junction with Tudor Street 2.7 metres on the east side and 15.4 metres on the west side."

The proposal is inadequate. The northern end of Bouverie Street is not addressed at all. There, the usable carriageway is very narrow in width because of a disabled parking bay (east side) and a dedicated cycleway on the western side; moreover, a little further south on the eastern side there are approximately 30 "Boris" bicycle hire stands in the carriageway and immediately opposite a very narrow section of footway on the western side (alongside the entire length of no 8 Bouverie Street). Immediately to the south of this section of Bouverie Street is the Polish Embassy where vehicles will necessarily need/seek to wait.

Bouverie Street is not, therefore, presently a suitable route to accommodate safely or otherwise satisfactorily a substantial increase in vehicular movement, especially delivery vehicles; and the proposed measures are insufficient.

Perversely, measures to improve the cyclist's journey seem to be at the expense of introducing dangers for other road users.

Although the closure of the New Bridge Street/Tudor Street is taken as a given in this consultation exercise, the proposed measures (above and below) call into serious question the wisdom of this measure. (It is not clear why cyclist is not to be accommodated in the central section of New Bridge Street, allowing delivery vehicles

to turn into and out of side roads? – all traffic including cyclists will in any event have to stop at the Ludgate Circus traffic lights.) The whole scheme appears to be an expensive, ill-thought-through, proposal.

"3. (b) Bridewell Place:-

(i) to introduce 'at any time' loading restrictions throughout the east-west arm; and (ii) in the north-south arm:-

(A) to remove the P&D parking place with two parking bays and the disabled persons parking place on the east side outside 'Bridewell Gate' No. 9 and No. 12;

(B) to relocate the P&D parking place with three parking bays from the east side outside 'Bridewell Gate' No. 9 to the west side at the rear of the 'Premier Inn' hotel, Nos. 1-2 Dorset Rise;

(C) to introduce 'at any time' waiting and loading restrictions on the east side;(D) to introduce 'at any time' waiting restrictions on the remaining lengths of kerbline on the west side, north and south of the parking place in (B) above;

(E) to introduce 'at any time' loading restrictions on the west side between the parking place and the junction with Tudor Street; and from the northern extremity to a point 15 metres north of the parking place."

The above proposals do not appear to make it possible for 2 vehicles to pass each other where traffic using the east-west arm of Bridewell Place turns into (and across the notional centreline of) the north-south arm.

Given that this is proposed to be a main route to/fromTudor Street, it is astonishing that 2-way traffic, particularly delivery vehicles, can be contemplated.

The consultation letter dated 10th December suggests that, in addition to Bridewell Place and Bouverie Street, the other 'entry' point will be Dorset Rise/Salisbury Court. This road again is totally unsuitable: beginning at its north end with Fleet Street, it is narrow because of a dedicated cycle lane and has a shared level with the adjoining pavements. This is hardly appropriate for turning delivery vehicles. A short way down the street there is a dedicated bay on the eastern side for doctors' parking, making vehicular traffic even by a single car impossible (other than by mounting the pavement on the western side) and in any event the cycle lane must be used; moreover along the whole length of the street there are only single yellow lines on either side. After the square there are dedicated parking bays on the western side of the street followed by dedicated motorcycle bays for approximately 12 motor cycles. It appears that none of these restrictions will be altered or removed by the proposed changes.

Richard Humphreys

6th January 2016

Gerry Lightfoot, Traffic Order Officer

Department of the Built Environment

City of London Corporation

Objections to the Proposals to close Tudor Street as part of the new Cycle Super Highway on New Bridge Street EC4

I am writing to object on behalf of my constituents in the Inns of Court of Inner and Middle Temple who will be detrimentally affected by the current proposals to close Tudor Street into and out of New Bridge Street. I should add that I am a tenant at Francis Taylor Building and therefore likely to be directly affected.

I have read the letter dated 22 December 2015 submitted by my fellow ward councillor Mary Mead OBE (attached to this email) I agree entirely with it and adopt the representations she makes *mutatis mutandis*.

I add that I anticipate that many of the barristers may not have appreciated the nature of the proposal particularly since the consultation coincided with the Christmas vacation. I would ask that consideration be given to a more effective consultation process be undertaken.

Yours sincerely,

Gregory Jones QC, CC (Farringdon Without)

Appendix 2

Transport for London's full design rationale

The objections received were all in response to the proposal to close Tudor Street to motor vehicles at its junction with New Bridge Street. Tudor Street is the main access to the streets that are bounded by Fleet Street, New Bridge Street, Victoria Embankment and the Temple. Northbound and southbound traffic on New Bridge Street can enter Tudor Street, but egress is restricted and vehicles are only able to go northbound on New Bridge Street.

The volume of traffic that turns left into Tudor Street from New Bridge Street during the peak hour would require traffic signals to be introduced to control traffic crossing the cycle track to prevent conflict with the expected high flow of cyclists in the track and also with pedestrians crossing Tudor Street. A design that did not include this would not be safe and would not be considered.

In order to introduce traffic signals for this movement, the left turn into Tudor Street would need to run separately phased from cyclists on the track, who would run with north and southbound traffic. This would require an additional lane for the left turning traffic to be held in. The width of the road at this point on New Bridge Street is too narrow to accommodate the basic requirements of a signalised junction. A layout that does not meet the basic requirements would not be safe to introduce.

The constraints with meeting the requirements for a signalised junction are:-

a. The width of the carriageway is too narrow to accommodate a traffic island to separately signal the left turn from the ahead movement. A separating island between the lanes would be required to make it clear that you could only turn left from the nearside lane;

b. The width of the carriageway is too narrow to accommodate a left turn flare to store vehicles waiting to turn left;

c. There is insufficient length of carriageway to store the predicted flow of vehicles continuing northbound on New Bridge Street behind those turning left without causing blocking back at the Blackfriars Junction. The proximity to the Blackfriars Junction is just 50m. According to the traffic flows, during the peak hour there are likely to be six vehicles waiting at the left turn stop line during each signal cycle time;

d. The location of the northbound bus stop servicing Blackfriars Station further limits the space to store vehicles waiting to turn left. The bus stop is 35m long (in order to allow two buses to pull up to the kerb-line and be fully wheelchair accessible) and its position in the 50m gap between the junctions would limit the length of the left turn flare to 6m (approximately one car / small van);

e. Relocating the bus stop north of the Tudor Street junction is not an option as the width of the carriageway is even less and removal of the stop would not be supported on the grounds of high passenger demand (over 400 passengers in the peak hour);

f. The footways cannot be reduced in width to create more carriageway space as the pedestrian flows are high and levels of service would be reduced; and

g. The cycle track has already been reduced in width from 4m to 3m for this section and reducing it further would fall below the minimum levels of service, particularly given the expected high flows of cyclists through this section.

The signal junction would need to run with 3 or 4 stages to accommodate the required movements. This could not be coordinated with Blackfriars Junction signals as there is always a stream of traffic feeding north onto New Bridge Street. The introduction of a signal controlled junction at Tudor Street that cannot store the expected vehicle demand would lead to the risk that pedestrian crossings at Blackfriars Junction would become blocked.

The introduction of traffic signals at the Tudor Street junction as opposed to the proposed signals at the Bridewell Place junction would still not permit southbound traffic to turn into Tudor Street. The carriageway width does not allow a right turn lane to be introduced and allowing this movement within the north-south traffic stage would result in vehicles waiting to turn blocking the southbound flow. If the cycles are not able to run with the north-south traffic then they would be subject to being held for too long at the signals.

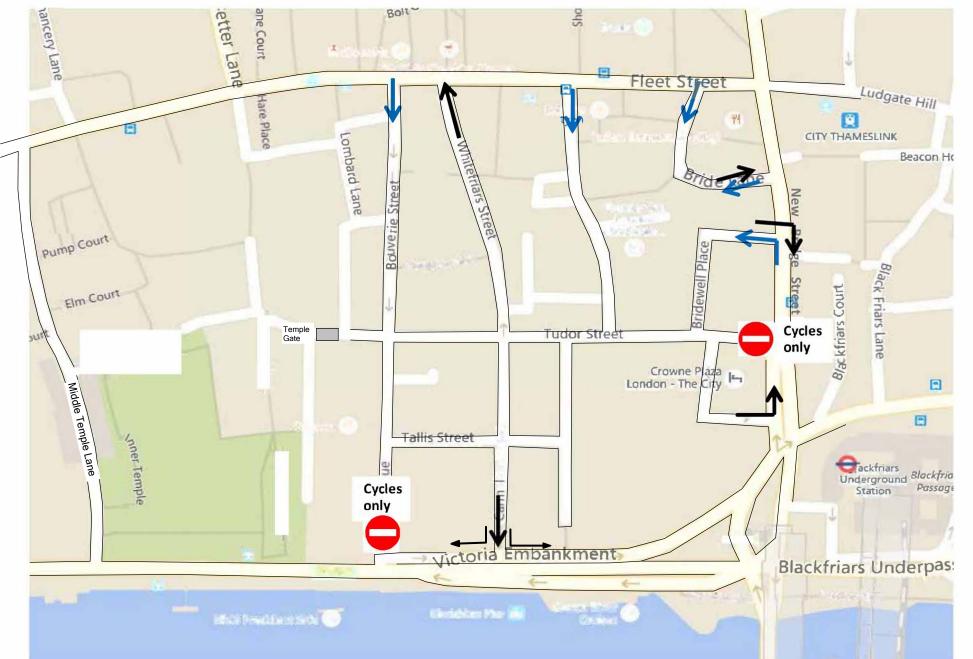
The proposed traffic pattern for Bridewell Place is for north-south ahead only traffic to flow along with the cycle track and pedestrians to cross Bridewell Place. The second stage is for traffic to turn left to enter Bridewell Place in addition to the northbound and southbound traffic while the cyclists and pedestrians are held. The final stage allows vehicles to turn right to exit Bridewell Place and pedestrians to cross New Bridge Street on the north side of the junction while all other movements are held.



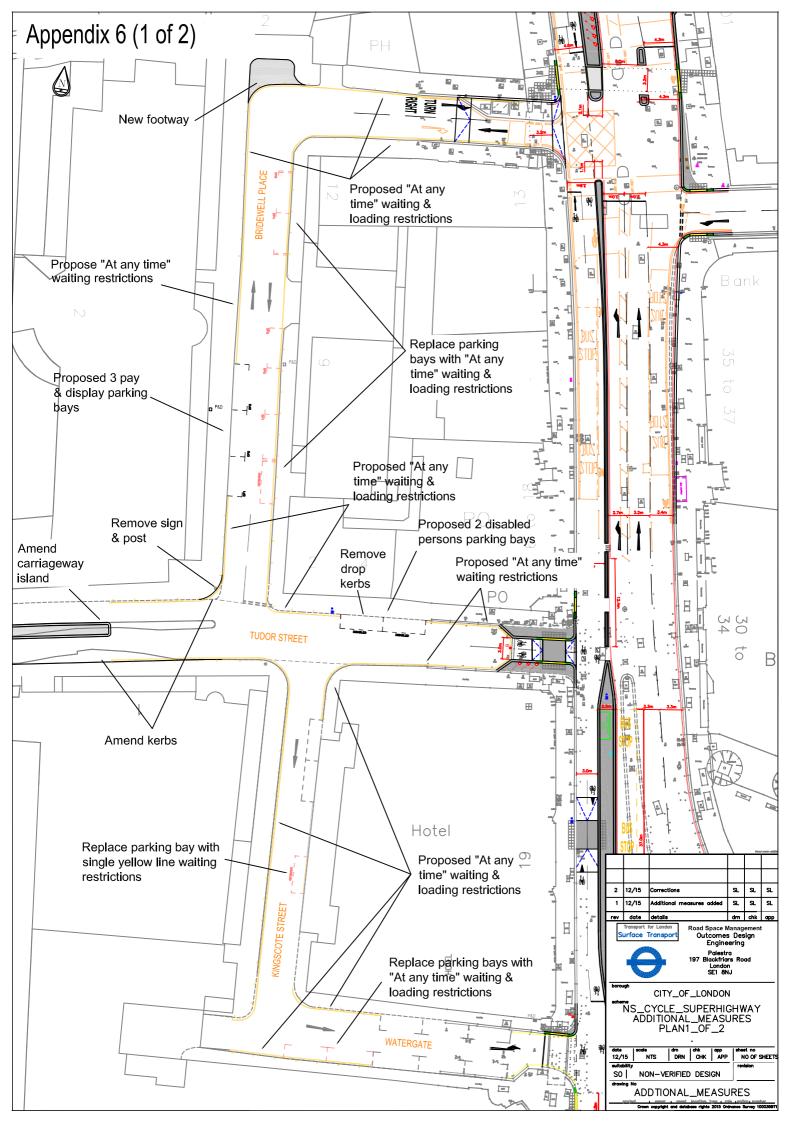
Appendix 4

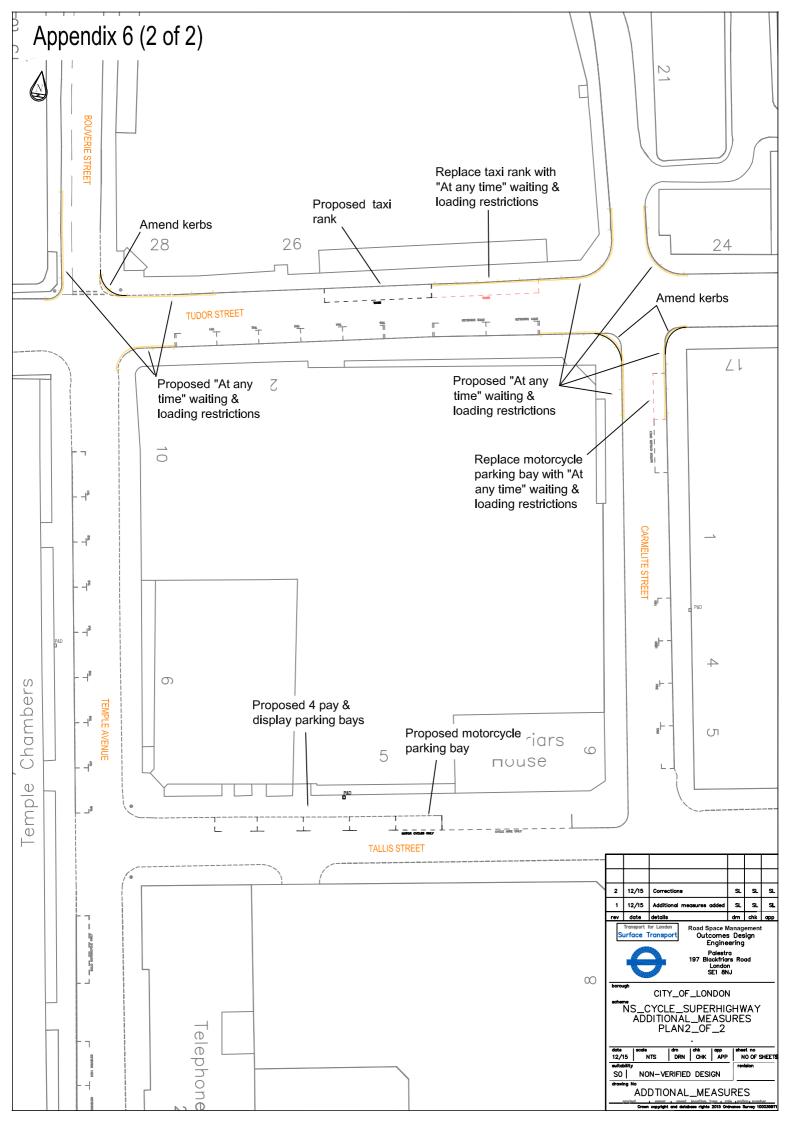
24 hour vehicle composition at Tudor Street (junction with New Bridge Street)

Vahiala turaa	Access		Egress	
Vehicle types	No. of	%	No. of	%
Pedal cycles	374	9	177	18
Motor cycles	371	9	84	9
Cars	1429	33	305	31
Taxis	1376	32	212	22
Light Goods vehicles	609	14	157	16
Mini buses	7	0	1	0
Buses	1	0	0	0
Medium Goods vehicles	184	4	50	5
Heavy Goods vehicles	8	0	0	0
Total	4359	100	986	100



Appendix 5 – Amended access & egress routes





Appendix 7

Transport for London



Councillor Marianne Fredericks Chairman of Streets and Walkways Sub Committee City of London Cooperation Members' Post Room PO Box 270 Guildhall London EC2P 2EJ

Transport for London Road Space Management

Nigel Hardy Head of Project Sponsorship Transport for London 3rd floor - Palestra 197 Blackfriars Road London, SE1 8NJ

Phone 020 3054 0385 Nigel.Hardy2@tfl.gov.uk

05 February 2016

Dear Cllr Fredericks

Traffic Management Order for closure of Tudor Street

Thank you for giving up your time to chair the meeting on 28 January. I feel it was a good opportunity to further engage with local stakeholders in the City of London to discuss the proposed Traffic Management Order to close Tudor Street to motor traffic as part of the North-South Cycle Superhighway.

As you know we have been working closely with City of London officers to develop the Cycle Superhighway, and the proposals for Tudor Street in particular. I explained at the meeting that we are fully confident in the designs that have been developed and the consultation that has taken place. Nonetheless, I promised to reiterate some of the key points to you in writing, which you will find enclosed.

I trust this provides the reassurance you asked for. As I confirmed at the meeting, whilst we have full confidence in the design proposals, we will monitor the closure of Tudor Street following implementation and if it is deemed that the current proposals are not operating as expected, changes will be made.

Finally I would like to pass on my thanks to the City of London officers involved in this process and the collaborative approach taken. I look forward to this continuing.

Yours sincerely

Nigel Hardy/ Head of Project Sponsorship



MAYOR OF LONDON

Public Consultation

The North-South (CSNS) and East-West Cycle (CSEW) Superhighway consultations ran from 3 September to 9 November 2014. We received 6,309 direct responses to the CSNS consultation alone of which 86% indicated full support and 3% partial support.

We undertook wide-ranging activity to raise awareness of the consultation, including:

- Leaflets to 230,000 addresses in postcodes within a 0.5 mile radius of the route
- Emails to over 2 million registered transport users on the TfL database (including Bus users, registered Oyster users, Congestion Charge payers, Barclays Cycle Hire members)
- Emails to over 700 stakeholder organisations
- Meetings with over 100 stakeholders prior to and during the consultation including meeting those on the proposed route
- Press releases and social media
- Press adverts and online including Google text ads, Facebook banners, postcode-targeted MMS messaging and face-to-face leafleting to promote consultation drop-in events.

The full detail of the proposals – including the closure of Tudor Street to motor traffic – was available on the TfL website. Paper copies of the consultation information were also available on request, along with large format displays at various public events which took place throughout the consultation. Paper response forms were available at public events, where members of the project design teams were present to discuss the proposals with visitors and answer questions.

During the consultation, the project team also undertook a 'door-knocking' exercise visiting every frontage along the route to explain the proposals and discuss their loading and servicing requirements.

Traffic Management Order consultation process

As part of the City of London (CoL) and TfL's statutory duty to advertise changes to Traffic Management Orders, the Orders for the banning of turns from New Bridge Street to Tudor Street were advertised by TfL between 23 June and 14 July 2015 and the banning of turns from Tudor Street on to New Bridge Street by CoL between 7 September and 9 October 2015. These consultations followed standard procedures based upon best practice.

The notices of intent were advertised in the local press (London Gazette and City AM) and notices were put up on lamp columns in the vicinity of Tudor Street i.e. at Blackfriars Junction, Ludgate Circus, New Bridge Street and within the Temple area.

Carmelite Street

As part of the CSEW proposals, Carmelite Street will be opened up to motor traffic and enable vehicles to turn right onto Victoria Embankment and turn left on to the Blackfriars Junction slip road and access Upper Thames Street via Queen Victoria Street and Puddle Dock. At the meeting on 28 January, it was asked whether it would be possible for vehicles to turn out of Carmelite Street and then left directly on to Victoria Embankment and through Blackfriars Underpass.

Given the presence of the retaining wall between the slip road and underpass, and therefore acute angle of the junction, it would not be possible for vehicles to safely turn left from the slip road towards Blackfriars underpass. We explored whether a direct link from Carmelite Street to Blackfriars Underpass could be created by removing a section of the retaining wall, however vehicles would need to cross two traffic lanes and a cycle track, which would not be safe without signalising this movement. Owing to constraints of the road space within the Blackfriars Underpass, the necessarily signal infrastructure cannot be safely accommodated to achieve this.

Blackfriars station bus stop

The CSNS proposals include the relocation of the northbound bus stop on New Bridge Street to the south of Tudor Street, closer to Blackfriars station. At this location, there is enough width for cyclists to safely bypass the bus stop as well as to accommodate a 2.5m wide island for bus passengers and space for northbound traffic to pass a stopped bus.

We have established the requirement for a 2.5m wide island by working closely with accessibility groups regarding the design of bus stop bypasses to ensure they are fully accessible. This width enables a ramp to be deployed and a wheelchair user to disembark safely on to the island. The width also takes into account bus passenger data to ensure there is adequate space for waiting and alighting bus passengers.

Given the physical constraints of the road layout in this area, it is not possible to maintain the bus stop in its current location or to relocate the stop further north or south as there is insufficient road space. Nor would it be viable to remove it as this stop serves Blackfriars station.

Dear Ms Fredericks,

Thank you very much for your email of 20th February. As requested, I now put our representation in writing.

Since the public meeting on 28th January 2016 the Inns have taken advice from respected transport consultants (Vectos). The inns are advised that, on any view, real improvements could and should be made to the scheme to the benefit of the Inns, without materially delaying the making and implementation of the order; in particular, and on any view, that egress should be allowed from the proposed Temple Avenue signalised junction not only for bicycles but, when and only when needed, also heavy goods vehicles (hgvs) (only). The City's 24 hour snapshot survey identified 8 hgv movements using the existing Tudor Street junction with New Bridge Street.

Importantly, the ability for hgvs to use the Temple Avenue would mean that deliveries from hgvs/pantechnicons/coaches can off-load at the Tudor Street gate main entrance, without thereafter having to <u>reverse down</u> Tudor Street to the Carmelite Street junction. Whilst TfL say that they will monitor the scheme, it is already obvious that reversing will need to take place if the scheme were to proceed - and this is obviously very undesirable. It should not be 'designed in' to the scheme from the outset.

The Inns note that, by your officers' own admission in the report to committee, manoeuvres for hgvs, whether rigid vehicles or articulated vehicles, at the junctions on Tudor Street will be "tight" – i.e. they assume complete accuracy by the driver in the manoeuvre (at any and all times of the day). Moreover, the officers' report implicitly admits that there is likely to be damage to pavements and street furniture from these manoeuvres if the orders are made and implemented since officers seek compensation for physical damage from TfL. The report makes no reference either to, or assessment of, the increased risks to pedestrians from these "tight" manoeuvres.

Furthermore, based on the evidence that we have been sent by TfL, which is as yet incomplete, these judgements have been made on the basis of swept paths from vehicles that are not as large or unwieldy as those that currently visit Inner and Middle Temples and will be expected to in the future. The consequence of such larger vehicles trying to pass through some of the "tight" turns as described by TfL for smaller vehicles, may result in greater damage, greater risk to personal safety and potentially blocked highways. We are urgently seeking clarification and further evidence from TfL, but until such time as this has been received we judge that there is severe risk to reasonable access.

The Inns believe it to be a reasonable request therefore that a few weeks be given for discussion and amendment to the traffic regulation proposed. Vectos believe that their proposals are achievable without material detriment in terms of delay or otherwise. They have closely studied the plans in the vicinity of the proposed Temple Avenue signalised junction.

The last thing either the City, the Inns or TfL would wish is for this matter to have to be taken to the High Court, with, on any view, all the delay and expense that will inevitably entail.

The Inns, however, take this matter, upon which neither they, nor we believe Freshfields solicitors, Jones Day solicitors nor JP Morgan (investment managers), were ever consulted, <u>very seriously</u>; and I am sure that you will understand that the Inns must, and do, reserve their right to go to the High Court pursuant to the 1984 Act if this matter cannot be satisfactorily and sensibly resolved.

We therefore respectfully request that there be no resolution to make the order at the committee meeting on Monday 22nd but that the resolution be that the matter be deferred until the next committee meeting.

Your sincerely,

Richard Snowdon

Dear Marianne,

Many thanks for sending me the link RE: North-South Consultation Stonecutter Street to King's Cross . I think the approach to the second phase of the consultation supports the view that the first phase could be done in another way.

I know that you have had representations from theRichard Snowdon FRICS, Director of Properties & Surveyorfor Inner Temple which I have read and I only set it below it for the benefit of the other planning committee members who may not have seen it .

It seems to me that the Inns have taken a very positive stance given the potential adverse effects the current proposals would have to the inns and the tenant. The Ins's transport experts have advised that real improvements could and should be made to the scheme to the benefit of the Inns, without delaying unduly the making and implementation of the order; in particular, that egress should be allowed from the proposed Temple Avenue signalised junction not only for bicycles but, when and only when needed, also heavy goods vehicles (hgvs) (only). This would avoid the need for HGVs etc to reverse down Tudor Street

I also note that the expert consultants have also identified gaps in the evidence based used by TFL.

I would ask the sub committee to agree to the Inns request to defer approving the resolution until these issues have been resolved.

The Temple is a vital part of the City and I know the committee values its contribution. I respectfully urge that no decision be taken without full consideration of the rlevant evidence.

Yours ever

Greg

Common Councilman (Farringdon Without)

Gregory Jones QC Also called to the bars of Northern Ireland and the Republic of Ireland

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Five Payed Kuldings Mr. Sells (D.C.

Transport for London (TfL) Cycle Superhighway Proposals

Briefing Note on the effect on the Temple and the Whitefriars Conservation Area

A: Introduction

- 1. This Briefing Note sets out the grave concerns of Inner and Middle Temples concerning the proposed changes to the local road network to accommodate the TfL Cycle Superhighways (CS). While the Inns pragmatically recognise that this project in principle cannot be halted or delayed, they wish to draw attention to the more deleterious effects of the proposals, and to suggest alternatives which should commend themselves to Councillors, without adverse consequences for TfL.
- 2. Section B of this Note sets out the relevant background; Section C describes the current local road access provision for the Inns; Section D summarises what is proposed; Section E draws attention to the significant defects associated with those proposals; Section F provides a workable alternative; and Section G contains a summary of the position as we see it.
- 3. This Note is written by the Directors of Estates of the two Inns, and has the full support of the Treasurers of the Inns and their members. It is intended that it be supported in the very near future by a report from the Inns' highways consultant, and by Leading Counsel specialising in highways law.

B: Background

4. The Temple comprises a large community of mainly barrister tenants and residents who lease premises owned by two of the four Inns of Court; The Honourable Society of the Inner Temple (IT), and the Honourable Society of the Middle Temple (MT).

- 5. Collectively, the occupying chambers employ approximately 2,500 people, while the two Inns additionally house approximately 200 residents.
- 6. The North/South and East/West TfL Cycle Superhighways (NSCS and EWCS) intersect at the northern end of Blackfriars Bridge.
- 7. Various aspects in the design of both CSs involve the alteration of the main road network and TfL now seek additional measures from the City of London (CoL) which proposes to make orders relating to the minor road network under section 6 of the Road Traffic Regulation Act 1984.

Both IT and MT have formally objected to the creation of the orders as they consider the proposals to be ill conceived, piecemeal, mutually detrimental and create a risk to business. There seems to us to be every indication that, absent firm handling by the CoL, these proposals will simply be implemented without proper consideration by TfL of the vast and long term detriment to the Inns.

C: Current access provision

- 8. Vehicular access to the Temple is solely through Tudor Gate at the western end of Tudor Street.
- 9. Vehicular egress from the site is via Embankment Gate, at the southern end of Middle Temple Lane, between 8am and 2pm on Monday to Friday only, and via Tudor Gate outside these times.
- 10. Tudor Street currently provides a straight and relatively commodious access road from New Bridge Street to the Temple. It allows straightforward access and egress for cars driven by those with employment or residence in the Inns, and all the variety of vehicles that service those purposes, ranging from vans to large lorries. Some of the latter may be unable to pass through Tudor Gate, but they can at least park in Tudor Street, from where goods and

materials can be craned or delivered into the Temple. This ability is particularly critical in the case of Inner Temple, which is about to embark upon a £20m redevelopment lasting two years, which will necessitate thousands of delivery journeys.

D: TfL's Proposed Changes

- 11. Reference is made to the before/after diagrams at pages 189 and 190 of Appendix 1.
- 12. The proposals involve, first, the closure of the junction of New Bridge Street and Tudor Street, and its replacement with access/egress via Bridewell Place to the north of the proposed junction closure, and egress via Kingscote Street and Watergate to the south.
- 13. Bridewell Place would become two-way. Both it and the Kingscote St/Watergate roads are currently one-way streets only.
- 14. TfL allege that they consulted in writing with all residents and businesses within 500m of the Tudor Street/New Bridge Street junction. They did not. Both MT and IT were unaware of the proposal until a member of staff noticed a lamppost sign which prompted the written objection from both. Additionally, on enquiry, neither Freshfields solicitors, nor Jones Day solicitors both major local occupiers were aware of the proposals.

E: The damaging effects of the proposed changes

- 15. The suggested alternative routes to the Temple from New Bridge Street are narrow, and contain blind, right-angled bends within them.
- 16. The proposed retention of parking bays in Bridewell Place will exacerbate congestion.
- 17. The current ability for southbound traffic to turn right into Tudor Street from New Bridge Street will be removed entirely under the proposals, thereby forcing such traffic to turn onto Fleet Street at Ludgate Circus and access the Temple via the unsatisfactorily narrow Bouverie Street.

- 18. Bouverie Street contains numerous obstructions; a diplomatic parking bay for the Embassy of Poland, a cycle hire station, a disabled parking bay and frequent vehicles loading/unloading, thereby restricting suitability for larger vehicles. There is no CoL proposal to remove these obstructions.
- 19. Bouverie Street also contains a contra-flow cycle lane, forcing cyclists into the path of oncoming vehicles in an already narrow road (as does Whitefriars Street to the east).
- 20. TfL has failed to identify that vehicles larger than can be accommodated through Tudor Gate serve the Temple. They park in Tudor Street and offload through Tudor Gate.
- 21. TfL has also failed to identify that a large proportion of traffic entering the Temple exits via the Embankment Gate from Middle Temple Lane. Closure of this route would exacerbate congestion in the Whitefriars area.
- 22. Residents who employ a removal contractor may suffer as a result of pantechnicons being unable to access the area. This size of vehicle has not been taken into account by TfL.
- 23. Significant filming takes place in the Temple. Film support vehicles often park in Tudor Street and are of a size not taken into account by TfL.
- 24. The closure of the southern end of Temple Avenue was proposed during the consultation period for the EWCS which closed before the NWCS proposals were published. This would provide a logical egress east/westbound to the Embankment. This mismatch of consultation periods denied local residents and business the ability to see the whole range of potential changes, and comment accordingly. As a consequence, no consultation has been permitted on the scheme as a whole, and it is clear that no consideration has been given to the effect of the proposals in their entirety. This is an unacceptable failure under the relevant provisions and has the result that the businesses and residents affected have been denied a fair and proper opportunity to comment on the scheme as a whole.

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- 25. The replacement of this egress point with Carmelite Street denies eastbound traffic direct access to the Embankment. Traffic is forced through an already busy Blackfriars junction and thence via Puddle Dock to the eastbound Lower Thames Street around a very tight bend.
- 26. By the CoL's own admission, larger vehicles will have to mount pavements in order to negotiate the proposed turns under the changes proposed. As paragraph 19 of the committee papers (attached as Appendix 1) states, it is seeking –

"a commuted maintenance payment from TfL to cover the potential increase in maintenance liabilities. The extra vehicles negotiating the tight junctions and other locations will invariably lead to vehicles mounting and damaging footways and other associated street furniture."

- 27. The proposed new bus stop on the northbound side of New Bridge Street will be an island, without a safe means of access for pedestrians. They will have to cross the NSCS which is expected to be busy with cyclists as TfL state, the "expected high flow of cyclists in the track".
- 28. Under the proposed changes, Bridewell Place contains three parking bays on the western side of the north/south limb. Traffic wishing to leave the area from Tudor Street will back up if faced with oncoming traffic if vehicles are parked in these bays.
- 29. The proposed new disabled bays to the east of the Bridewell Place/Tudor Street junction will be in a dead end to vehicular traffic, with no easy turning ability. Manoeuvring in this area will be difficult and in conflict with the retention of cycle-only access through the New Bridge Street/Tudor Street junction.
- 30. Both the new proposed access/egress points from Tudor Street (Bridewell Place and Watergate) will be traffic light controlled, thereby introducing a further set of traffic lights in New Bridge Street.
- 31. TfL state that the removal of both, and the introduction of a new traffic light controlled junction at Tudor Street will increase congestion and cause backing up into the Blackfriars junction.

F: Suggested alternative measures

- 32. Close Bridewell Place and Watergate to all traffic and retain Tudor Street junction under traffic light control. This replaces two junctions crossing the NSCS with one.
- 33. Incorporate CCTV monitored yellow box restrictions to avoid traffic blocking junctions.

- 34. Retain the bus stop in its current position to the north of the Tudor Street junction. Cycles held at traffic lights will then allow safe passage for pedestrians to access the island bus stop.
- 35. Remove the parking and other obstructions from Bouverie Street, together with the contraflow cycle lane in it and Whitefriars Street, leaving Bouverie Street fully southbound, and Whitefriars Street fully northbound.
- 36. Retain egress to the Embankment, both eastbound and westbound, via Temple Avenue, thereby allowing eastbound traffic direct access, and alleviating unnecessary pressure on the Blackfriars junction. If traffic was to be two-way in Temple Avenue, this would further alleviate traffic pressures on the Blackfriars junction.

Summary G:

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- 37. The introduction of the proposed measures is ill-thought and does not interrelate or integrate with the measures proposed under the EWCS plans. It has failed wholly to consider the position if traffic is not able to exit on to the Embankment via Middle Temple Lane, which may be a consequence of the construction of the proposed Garden Bridge. This will have major implications on the eastern roads outside Tudor Gate which TfL has failed to recognise. There is no tangible evidence that TfL wishes to engage in any way with the long term and serious consequences of its proposed changes.
 - 38. Adoption of the measures proposed would have a detrimental and commercial damaging effect on the ability of local businesses to receive deliveries by larger vehicle, thereby damaging business and increasing cost. This would result in more frequent deliveries by smaller vehicle thereby increasing traffic and emissions.
 - 39. Residents would be detrimentally affected by the inability of large removal vehicles to access the area.
 - 40. Pedestrians would be at risk as large vehicles try to negotiate tight turns and are forced to mount pavements.
 - 41. CoL's street maintenance cost would therefore increase as pavements have to be repaired or replaced.

42. TfL's consultation and analysis is flawed, and does not take account of the full range of vehicles that need to access the area, or the dispersal of traffic through the Temple.

February 2016.