

St Bartholomew's Hospital

Dear St Paul's Gyrotory Transformation Project Team

Further to our letter earlier in the year, this is a formal response on behalf of St Bartholomew's Hospital (Bart's Health NHS Trust) to the St Paul's Gyrotory consultation.

Firstly, thank you to the City of London and your team for your engagement with the hospital and running consultation events on site for NHS staff, QMUL students and our patients.

St Bartholomew's Hospital welcomes the plans being consulted on and recognises the opportunity this presents to improve both the public realm as well as connectivity for those who work at or visit our campus. Overall, we are very supportive of the vision and ambition for the area with a clear focus on public realm improvements whilst improving pedestrian/cycling amenities and safety.

Option 1A addresses concerns raised regarding blue light access to St Bartholomew's Hospital from the London Wall (North and North-East access routes). The hospital's dedicated blue light entrance is on Little Britain (North), having a convenient access coming off The London Wall via Montague Street will provide LAS with improved access to the hospital compared to current road layout.

It is recognised there are some changes to LAS journeys approaching from the West via Newgate Street with changes to lower King Edward Street and note traffic modelling indicates this will not materially impact LAS journey times. We would like to note concern regarding LAS journeys from both Newgate Street and Cheapside approach once they reach Angel Street/King Edward Street. King Edward Street is already heavily congested at times. We would prefer Angel Street and King Edward Street to be access only for blue light vehicles, public transport including taxi's along with delivery and resident access. This would improve access to the hospital entrance and deliver an improved environment around the hospital with the potential for a "healthy hospital street" concept. We recognise this would require St Martin Le Grand and Aldersgate Street to become two-way down to London Wall and this is in part dependent on the future development of the London Wall roundabout. We would hope this could be an evolution of these plans in time.

We note option 1A also makes Little Britain (south) restricted access, this would be positive if it results in less idling and on street parking along this narrow street. We note this street is a popular and busy pedestrian route and would like to see more pedestrian improvements. The continuous pavements at either end improve pedestrian priority. With restricted access, a pedestrian priority shared space with continuous level paving would be advantageous here as many people walk in the road due to the narrow pavements. Some staff have suggested another entrance to Postmans Park would enhance the character of this space.

We welcome the relocation of the bus stop on King Edward Street nearer to the hospital entrance. This will be more convenient for staff and visitors using the bus. The removal of the bus stand will also alleviate a current pinch point on King Edward

Street which usually has two and sometimes three buses parked up. Relocation of bus stop and routes to Giltspur Street are noted and would suggest a location as near to the hospital entrances as possible.

We welcome the many improvements for active travel incorporated within the scheme. The majority of our staff and students travel to St Bartholomew's either by public transport, cycling, walking or a combination of those. As referenced with Little Britain (south) example it would be beneficial to see more pedestrian prioritised spaces to improve permeability of surrounding areas. Equally it would be beneficial to see consistent use of continuous pavements at crossings (e.g. Gresham Street) and services access points. The improvements to cycling in the area is welcomed, cycle phasing traffic lights would be helpful particularly at junctions or turnings. Our suggestion for a "healthy hospital street" on King Edwards Street would provide a useful quiet route for walking and cycling in the future linking with other such routes in the neighbourhood.

Additional comments:

- A need for improved priority for pedestrians at signalled crossings to reduce waiting times to cross
- Would like to see greening opportunity maximised both at the new public Square and also surrounding areas e.g. upper King Edward Street
- Road signage and pedestrian wayfinding should reference St Bartholomew's Hospital and highlighting it "does not have an A&E"
- We would encourage efforts to reduce traffic volumes as part of an area plan and would encourage CoL to work with TfL to further prioritise walking, cycling and public transport whilst maintaining access for those with disabilities, hospital transport including blue light.
- We would like to see dedicated dockless bays located in convenient locations to ensure dockless bikes/scooters users have adequate convenient facilities to avoid leaving them obstructing pavements.

We look forward to seeing output from the current consultation

Yours Sincerely
St Bartholomew's Hospital
Bart's Health NHS Trust

London Cycling Campaign

St Paul's Gyrotory transformation consultation

About LCC London Cycling Campaign (LCC) is a charity with more than 20,000 supporters, of whom more than 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital. Consultation response The LCC fully supports the more detailed response to this consultation by our local group, the City of London Cycling Campaign.

We support this scheme, with some caveats.

- In general, the proposed changes are welcome and we think will have a positive impact for people walking, wheeling and cycling.
- We particularly welcome the new protected cycle infrastructure proposed for St Martin Le Grand and Newgate Street and the pedestrianised stretch of King Edward Street.
- However, more needs to be done to reduce motor traffic in the area, as the scheme still prioritises the flow of motor vehicle traffic. It leaves room in places for continuing traffic domination and danger and will still effectively be a gyratory. Prioritising motor traffic may also result in long wait times for people cycling at red lights, leading to some people cycling on the carriageway instead of the protected cycle lanes.
- We're also concerned that the bi-directional track on St Martin Le Grand will be confusing and non-intuitive at junctions, leaving people cycling on the carriageway by mistake. We would prefer to see with-flow cycle lanes throughout.
- We agree with St Bart's Hospital that making King Edward Street access-only by private vehicle would help to complete the transformation of the St Paul's gyratory. There may be other options that would achieve the same effect, but in any case, we would urge the City of London to be bolder about traffic reduction.
- For people cycling northwest through the scheme, King Edward Street, Angel Street and Little Britain will not provide a good level of cycling service. These streets fall short of the TfL cycle route quality criteria in terms of traffic volume where there is no protection for cycling.
- We disagree with the decision to ban cycling in the new public space south of King Edwards Street. This will discriminate against people who use their cycle as a mobility aid. Other similar traffic-free areas do not ban cycling, such as Aldgate Square. Allowing cycles would make the space more accessible and provide an additional route for those new to cycling, children and others, between Newgate Street and King Edward Street, but is unlikely to be heavily used as a cycle route due to the high pedestrian footfall.
- Finally, we look forward to St Paul's cycle routes being connected to a wider cycle network in the City of London. While this can't be built overnight, it needs to be expedited, to enable a greater shift to cycling for a diverse range of people and meet the City's safety and climate goals.

City of London Cycling Campaign consultation response

St Paul's Gyratory

About the City of London Cycling Campaign The City of London Cycling Campaign is the local group of London Cycling Campaign (LCC). LCC is a charity with more than 20,000 supporters, of whom more than 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital. Cycling in the City of London In the City of London, LCC wants to see a fully connected, safe network for cycling that enables people of all ages and abilities to cycle - and has capacity to cater for high numbers of people cycling and a wide range of cycle types (including cargo, e-bikes and so on). This network should meet the highest standards and offer routes that are coherent and direct, both within the City and

joining up to neighbouring boroughs' cycleways. We believe the City of London can only meet its rightly ambitious climate, safety and traffic reduction targets with such a network - delivered via a mix of protected cycle tracks and low motor traffic, low speed streets.

Overall consultation response:

- In general, the proposed changes are welcome and we think will have a positive impact for people walking, wheeling and cycling.
- We particularly welcome the new protected cycle infrastructure proposed for St Martin Le Grand and Newgate Street and the pedestrianised stretch of King Edward Street.
- However, more needs to be done to reduce motor traffic in the area, as the scheme still prioritises the flow of motor vehicle traffic. It leaves room in places for continuing traffic domination and danger and will still effectively be a gyratory. Prioritising motor traffic may also result in long wait times for people cycling at red lights, leading to some people cycling on the carriageway instead of the protected cycle lanes.
- We agree with St Bart's Hospital that making King Edward Street access-only by private vehicle would help to complete the transformation of the St Paul's gyratory. There may be other options that would achieve the same effect, but in any case, we would urge the City of London to be bolder about traffic reduction.
- Finally, we look forward to St Paul's cycle routes being connected to a wider cycle network in the City of London. While this can't be built overnight, it needs to be expedited, to enable a greater shift to cycling for a diverse range of people and meet the City's safety and climate goals.

Detailed response

These comments are in the order of the (design) sheets showing the detailed designs of the scheme.

Sheet 2 Newgate Street (westbound) The relocated bus stop cages interrupt the unprotected cycle lane. This will make the cycle track less inclusive, as some people will be put off the cycle route by buses pulling into the cycleway.

Sheet 3 New Cycle Gate on Newgate Street (eastbound) We welcome the cycle gate which will improve safety for people cycling and separate them from traffic turning left into St Martin's Le Grand. However, it is not clear how people turning left at this junction will be directed to go north up St Martins Le Grand onto the bi-directional cycle track. There do not appear to be any road markings on the scheme drawings. People will be likely to turn left into the general traffic lane and then not be able to get into the protected lane - if they intend to continue north by bike they will get stuck at the Angel Street junction, where they are not permitted go north from the general traffic lane. New bidirectional protected cycle lane section on Cheapside Access to this lane from New Change is via a diagonal link across Cheapside. We welcome this physically protected space for people cycling, but the choice of bi-directional tracks makes the layout less intuitive and direct. This is likely to be confusing for people cycling who are new to the area as they can either proceed west towards Newgate or take the diagonal link to proceed north into St Martin's Le Grand. This arrangement will require clear signage. Cheapside westbound between New Change and St Martin's Le Grand. The unprotected cycle lane on the south side of Cheapside is being removed and replaced by the new protected bidirectional lane on the north side (which feeds into St Martin's Le Grand). People cycling westbound to Newgate St will no longer have the benefit of a cycle lane feeding into

the ASL at the St Martin's Le Grand intersection. This could be ameliorated by a new cycle only traffic light phase from New Change, so long as it is a whole separate phase not just early release, however this will not help people who cycle from eastern Cheapside. Overall the bidirectional cycle lane design will make the scheme confusing, particularly for new cyclists. Were with-flow protected cycle tracks considered, and if they were, why were they rejected? This would have made the scheme more intuitive.

Sheet 4 New Change southbound There is no protected space for people cycling south on New Change. The carriageway also looks as if it may be within the 'critical issue' width range of 3.2 - 4m where drivers may be tempted to overtake cycles without enough space to do so safely (TfL cycle route quality criteria 3). The decision to use advisory lines in non-standard ways is questionable in the centre of the street. Consider adding a south bound protected cycle track or extending the footway, which would also address the critical lane width.

Sheet 5 St Martin Le Grand junction with Angel Street Cycles turning left into Angel Street do not seem to be protected from general traffic as they cross the carriageway - they should have their own cycle phase for safety. For people turning right by bike into Angel Street this looks like an even more intimidating manoeuvre. People cycling in the northbound traffic lane can't continue north, if they are in the traffic lane by mistake - a safe route across this junction is needed. St Martin Le Grand junction with Gresham Street This junction is wide and flared and risks collisions between turning vehicles and cycles going southbound. A continuous footway here would make the priority clearer.

Sheet 6 Angel Street and King Edward Street There is no protection planned for people cycling on either Angel Street or King Edward Street north of the proposed pedestrianised area. For those cycling northwest through the scheme area, they will be cycling with volumes of traffic that will not feel safe or comfortable. The projected traffic levels on King Edward Street of 501 general traffic PCUs plus 24 buses in the afternoon peak is above the TfL maximum limit of 500 per hour for cycles mixing with traffic, and cycle route quality criteria 3 says the ideal is below 200 per hour. A good solution would be to make King Edward St access only for general traffic except buses and cycles, creating the 'healthy hospital street' that St Barts is calling for as well as a safe, low traffic route for cycling. King Edward Street pedestrianised section Banning cycling here is not inclusive for people who use their cycles as a mobility aid, and will be difficult to enforce. We would like to see cycling allowed (as it is on Aldgate Square). High pedestrian footfall will deter most people using it as a cycle route, while making the space more accessible and providing an additional route for those new to cycling, children and so on.

Sheet 7 Little Britain (south) As for Angel Street, this route will be needed for people cycling from or to the northwest of the scheme, but has no protected space for cycling, nor is it low in traffic. Making King Edward Street access-only for general traffic would address the problem by making Angel St a very safe, low-traffic street for cycles to use (in both directions). Aldersgate Street It is not clear from the drawings whether the southbound cycle lane is protected - both north and southbound cycle lanes should have physical protection. Aldersgate Street and St Martin's Le Grand side street junctions The footways are interrupted by side streets and service access into buildings. We propose making these footways continuous (Copenhagen crossings) to reinforce the recent changes to the highway code and improve the pedestrian experience, especially for those wheeling and using walking aids in the environment around the hospital.

Sheet 8A Montague Street We support option 1A in line with St Bart's Hospital's request to allow easier blue-light access to the hospital. The lane could be restricted to ambulances only with ANPR cameras. The plans appear to show continuous footways over side streets which are very welcome for safety.

London Living Streets

I am responding to the consultation on behalf of London Living Streets which brings together representatives of the many borough Living Streets' groups in London.

We strongly support the proposed new public square in King Edward Street.

We are keen that it should be seen as part of the Destination City Project, attracting visitors to the City as well as being a place for workers and residents, and those attending St Bartholomew's Hospital as staff, patients or visitors. In particular, we believe the new square should include a children's playground and exercise facilities for adults. The new square presents an opportunity to do something different from the other squares.

The new square hugely improves the walking route from the City to Smithfield, which will be part of a formal new Leisure Walk from Peckham to Epping Forest. We hope that there will also be improvements to create a better pedestrian environment north of the new square.

We will also be asking our members to fill in the survey individually.

London Living Streets

St. Paul's Cathedral

Dear Members of the Project Team,

Second Consultation Response: St Paul's Gyratory Introduction

I write on behalf of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding our response to the recent further consultation by the City of London on the proposed re-configuration of the St Paul's Gyratory.

Background and Previous Commentary

The Cathedral previously provided comment on initial options for redevelopment (letter dated 25th January 2023). While we do not seek to reproduce the contents of this letter, in summary our comments included:

- A preference to Option 1 of the numerous options discussed
- Welcoming the creation of a new public space to King Edward Street and Christ Church Greyfriars.

- The ambition to integrate the Cathedral into the areas to the north through improved wayfinding and public realm, especially with a focus on welcome from St Paul's tube station.
- Concern over the relocation of Coach Stops to St Martin Le Grand, Angel Street and elsewhere, given the potential implications for access to the Cathedral (especially with the Equality Act in mind) - Potential impact to Bus routes servicing the Cathedral.
- A general comment on our desire to see improved wayfinding, spatial legibility and heritage interpretation interventions in the area.
- The desire to see how the proposals would affect the Cathedral, preferably through research undertaken on Space Syntax or Crowd Movement. Whilst we have had some contact with the St Paul's Gyratory project team since our representations in January, no meeting has yet been set in place for further discussion.

Commentary on Current Proposals

The current proposals concern Option 1/1A. As noted above, whilst detail still needs to be considered, our previous preference was Option 1. As such, we welcome the direction of the scheme and support its ambitions for the area. Specific comment on the latest consultation is provided below.

Option 1 / 1A Differentiation

The information provided on the consultation website (including the plans provided) make differentiating between 1 and 1A difficult. We understand that option 1A would involve 2 way working for vehicles on Montague Street. Would this affect the public realm. Is more detailed information available about the differences between the two schemes in terms of any potential subsidiary effects?

Public Open Space Consultation

We note that the proposed public space is still at the concept stage, with the FAQ document stating that the next public consultation launched in late August. We have not been informed of any specific consultation and seek to liaise with the City to input to this process.

We are aware of the initial landscape strategy by LDA, but have not reviewed this design work. Clearly the landscape strategy and the technical work on the highway design needs to be closely coordinated.

Relocation of Coach and Bus Stops

The consultation documentation appears to make no specific reference to where coach stops, currently located to Angel Street and St Martin Le Grand, will be removed to. As previously mentioned, these stops are important to visitors to the Cathedral (and indeed to the City of London at large for Destination City). We therefore again seek assurances that the proposals will not adversely affect this route to the Cathedral and provision will be provided in an adequate location elsewhere.

We note that the Committee report records that these 6 stops have been out of use since February 2022 due to the construction of 81 Newgate (and this will continue to 2025). However, we seek assurance on the 'overall spare capacity for coaches to

park' elsewhere, especially as the report 'on street coach parking is operating close to capacity' and Tower Hill is referenced as an alternative which is 1.3 miles distant.

We note that a number of bus stops are being re-located. We would seek assurance from the City that the new locations will be carefully considered with regards to their proximity and efficacy of travel, including for people with mobility impairment, to and from the Cathedral.

Accessibility and Disability provision

It remains a long-held concern for St Paul's that the City does not seem to have a coherent and comprehensive strategy for accessibility provision. We continue to raise the concern about accessibility pick up and drop off in this area and provision of Blue Badge parking. This is something that COLAG will rightly champion, but we must remind officers that there is a statutory duty in the Act and there is an unanswered concern on this subject which we have been raising since the 2014 Cheapside and Guildhall area enhancement strategy consultation.

Wayfinding, Public Realm, Destination City and Cultural Mile While we understand this consultation is at an early stage, we would be very interested in the form of potential public realm improvements that would be implemented in the area. We hope to discuss this further with the City. It is a long-held incongruity that visitors emerging at St Paul's tube cannot easily find St Paul's Cathedral, which they are visiting. There is no indication that all these many lost-souls will be supported by this project. Likewise the way-finding strategy needs to be coordinated on a much wider remit to include the 'Cultural Mile'. Where will these more strategic plans be formulated? As City officers will be aware, we have offered in the past and continue to be open to discuss the possibility of loans of robust and beautiful artefacts from our collections to adorn the public realm if felt to be desirable. As we continue to ask, the policy for trading in these open spaces needs to be transparent and consistent. We have been raising this in similar consultations since 2014.

Additional Assessment

As previously requested, it would be incredibly useful to understand how the proposals would affect the Cathedral through changes in pedestrian routes and footfall. If this research has been undertaken we would hope it is shared with the Cathedral.

Conclusion

We welcome the spirit, aims and objectives of the proposals, which have the potential to reinvigorate the public realm in the close setting of the cathedral. However, we remain concerned over aspects of the proposals and the impact these may have upon visitors to the Cathedral. We also remain curious in regard to future wayfinding improvements that could be incorporated in the area more generally to seize this opportunity for public realm enhancement.

We would invite the project team to contact us to discuss how the Cathedral may be involved in the evolution of St Paul's Gyratory into the future.

Yours sincerely, St Paul's Cathedral.

Licensed Taxi Drivers' Association St. Paul's Gyratory Transformation

The Licensed Taxi Drivers Association (LTDA) is the largest membership body representing London's black cab drivers and has been the professional and authoritative voice of London taxi drivers for more than 60 years. We are dedicated to supporting our members, maintaining the high professional standards London taxi drivers are known for and ensuring regulation governing the taxi trade nationally is effective.

Representing the interests of London's self-employed taxi drivers, the LTDA favours maintaining road space and vehicular access to promote the effective circulation of vehicles and proper road access for taxis in and around St Paul's Gyratory, to ensure taxis can continue to provide a reliable and efficient service. We are broadly supportive of the proposed plans as we can see the benefits and recognise that they will deliver significant improvements to the overall look and feel of the area, as well as making the area a safer and more pleasant one to visit, live or work in and travel through. However, there are some elements of the scheme which are potentially concerning.

We are keen to ensure that licensed taxis can circulate freely within the area and continue to service passengers effectively, in what is a busy and popular area, with significant demand for taxis.

It is important that taxis maintain effective access to St Bartholomew's Hospital to enable them to continue to provide an accessible, door-to-door service for passengers needing to access it, including disabled people, specifically wheelchair users and anyone with mobility issues. We would like to seek assurances to that end.

Our key concern with the scheme is ensuring that the relocation of ranks space from Angel Street and Aldersgate Street to Gresham Street creates useable, well-functioning ranks, which support London's licensing taxi drivers looking to earn a living and plying for hire in the City of London so that tourists, other visitors, and business travellers can easily find a taxi when they need one. Relocating the ranks is not in itself an issue. It makes sense given that the current ranks would be in what will essentially be a building site for the next few years. However, we would be keen to discuss the positioning of the new ranks in more detail to ensure they are fit for purpose and support the efficient and effective servicing of the area by our members.

We work closely with other London boroughs and TfL's Ranks and Highways team to determine the best location for new taxi ranks, ensure any changes to existing ranks do not cause any issues and are appropriate. This includes making site visits to consider the practicalities and functioning of a rank in practice. As it stands, we do not currently have a point of contact within the City of London to discuss matters relating to ranks with. We believe it is important that we have an opportunity to provide feedback and offer our insights as there are issues that may not be immediately apparent to officers who are less familiar with the practicalities of taxi ranks and what works and doesn't work well. We used to have a contact within the City of London Police, who led on taxi ranks within the Square Mile. This person has now left the role and we have not since had any specific dialogue with City of London representatives on rank issues.

For example, one concern we have is whether the new rank spaces on Gresham Street will still be easily visible once the planned development and greening works in the area are completed. It is vital to ensure that there are clear lines of sight from the main road and key locations in the area so that members of the public can still easily find a taxi in the area and that there is clear wayfinding in place to direct passengers to the rank. We would also like to understand more about the plans for development of 81 Newgate Street and how this will affect the streetscape, and any potential implications for the proposed taxi rank.

As the plans are developed further, we would like to request a site visit or at the very least a meeting with City of London officers to better understand the final look of the scheme and the new developments planned in the area, as well as to understand the scope of the ranks i.e., the hours of operation and usage to ensure that this all appropriate and well-planned.

Moving forward we believe this should be part of process for all new schemes and welcome dialogue on ranks more broadly. We would ideally have a key point of contact within the Corporation to discuss issues relating to ranks with, both as the LTDA and through the wider London Cab Ranks Committee, which brings together several taxi trade bodies to provide feedback on proposals and to advocate for new ranks in key locations.

Licensed Taxi Drivers' Association