

St Paul's Gyrotory Transformation Project: City of London Access Group (CoLAG) Consultation Feedback

Introduction

The City of London Corporation (CoL) are planning a transformation of the streets between the former Museum of London roundabout and St. Paul's Underground station, with an aim to make the area feel safer, less traffic - dominated for walking, wheeling and cycling, and a greener and more pleasant environment for all.

The project is currently in the consultation stage, with public consultation through online surveys and drop - in meetings.

As part of the consultation stage, The City of London Corporation commissioned Transport for All to facilitate a consultation session, with the City of London Access Group (CoLAG) on the 7th of September 2023.

During the session, the proposed changes were presented by the City of London Corporation, whilst Transport for All facilitated and gathered feedback provided by CoLAG members.

CoLAG members had the opportunity to provide further feedback in writing, after the consultation session. The collated feedback presented is a summary from both the consultation session and additional written feedback. The points contained within this feedback summary were expressed by either one CoLAG member or multiple CoLAG members. The feedback has been ordered in line with the presentation.

People present:

Neil West – Project Manager, City of London (Presenter)

George Wright – Project Manager, City of London

Zaineb Hadi – Associate Consultant, Transport for All (Facilitator)

Amanda Jacobs – Chair, CoLAG

Alex Matthams - CoLAG

Jakki Mellor - Ellis - CoLAG

Kush Kanodia - CoLAG

Nicholeen Hall - CoLAG

Rebecca Oliver – CoLAG

Feedback

Vehicle routes:

- It was asked whether, with vehicle route changes, City of London have modelled how long it would take ambulances to get to St. Bartholomew's Hospital. CoL explained that this hospital does not have an A&E department and reassured that they have been liaising with them to pick up on any issues with increased blue light response times depending on route taken and that the hospital / London Ambulance Service (LAS) support the route change.

Bus stops / stands:

- There was concern expressed about the proposed relocation of the route 100 bus stop to Giltspur Street, as it's quite a long distance from the current bus stop location. It would be moving from the front of the hospital entrance, near the reception, to round the back. Although it's possible to enter from the back entrance and walk through the hospital, it's difficult to find that entrance and it's quite a long walk. It was therefore suggested to look at this again.

Bus routes:

- There are questions about whether there are changes to the 133 bus route. A CoLAG member uses this bus regularly, boarding at Little Britain, and is concerned as the diagram shows the 133 bus route along Newgate Street and then disappears. It was stated that that this is a very well used bus stop, close to the Barbican, and that they would like reassurance that this bus route is not being diverted.
 - **CoLAG have requested that CoL provide them with feedback on this matter.**

Bus stop with cycle bypass (image of St Martin's Le Grand looking south):

- It was expressed that many disabled people dislike floating bus stops and there was concern about how the proposed bus stop design still seemed like a floating bus stop.
- It was explained by CoL that a controlled crossing will be in use in the form of a zebra crossing (with tactile paving and Belisha beacons), at which cyclists legally have to stop to allow pedestrians to cross, otherwise they can be fined. However, there were still concerns from CoLAG about how this will be enforced.
- It was asked whether there is any specific evidence that this bus stop design leads to cyclists slowing down and stopping to allow pedestrians to cross, as cyclists may still continue without stopping.
- Concerns about pedestrian safety were expressed, and personal experiences of being hit by cyclists were shared by some CoLAG members.
- There were concerns about how cyclists don't have to pass a test or be licensed or insured, which is a wider issue as this could prevent a lot of issues and accidents.
- It was suggested to install a camera at the crossing for enforcement, as otherwise there would be too much reliance on trust or the chance that a police officer would be in the area to witness accidents / hand out fines, which was felt to be highly unlikely.
- Although CCTV may be on this street, it was still suggested to have a physical camera, which is visible to cyclists, on the crossing to encourage cyclists to slow down and stop. It was felt that a camera could serve as a deterrent and as a reminder to cyclists that they could be prosecuted.
- It was asked how blind and visually impaired people would know when to cross as, with a zebra crossing, there will not be a rotating cone underneath a pedestrian crossing control box as there are with pelican crossings.
- It was also asked why a light - controlled crossing e.g., pelican crossing, couldn't be used instead. CoL explained that Transport for London (TfL) stated it was too close to the junction down the road to do this, however they will follow this up with TfL to explore this option further.

- It was felt that island bus stops can be controversial, as although current guidance permits them, and in places like Brighton they have received positive feedback, many CoLAG members have raised concerns about them.
- It's felt that roads in London are too small for all the different uses they are needed for.

Bus journey times:

- It was asked why one bus route's journey time will increase by a few minutes when the average increase will be 30 seconds or less. CoL explained that this is the route 100 bus and that the journey time is due to the proposed relocation of the bus stop to Giltspur Street. Transport for London (TfL) considers the longer delay low impact, though CoL is still waiting for sign – off through TfL's Scheme Impact Report.

Walking:

- There were questions around how blind and visually impaired people could safely cross at raised tables, as well as whether raised tables could potentially disadvantage cyclists who use adapted cycles, depending on the gradient. CoL explained that the raised tables will cross the whole roadway, there will be tactile paving at crossings across raised tables and that raised tables will be gradually sloped.

New Change junction:

- It was asked whether there will be any protections in place for pedestrians to cross from one side of the road to the other at junctions, as it was stated that cyclists don't always pay attention to traffic signals. There was also concern around how cyclists cannot be found and fined, because they aren't licensed.
- CoL acknowledged that this is a widespread problem and highlighted the City of London Police cycle enforcement taskforce who can be made aware of particular junctions and issues to look out for. It was stated that in this proposal, CoL have created separate spaces for cyclists and motorists to make it as safe as possible for cyclists, and that cyclists have to obey traffic signals or risk being fined.

Cycle Routes:

- It was asked how cycle lanes will be segregated and CoL explained that, where possible, they prefer to use kerbs and small islands to create as much distance as possible between the main traffic and cyclists. However, where this is not possible, due to limited road space, they use wands.
- CoL acknowledged feedback from previous consultations regarding facilitating the use of adapted cycles and it was agreed that this is important and that Transport for All's Pave the Way report found that nearly 20% of disabled Londoners regularly cycle.

Newgate Street looking East:

- There were concerns about how the cycle lane is segregated with the use of wands (vertical round posts) in the image shown, as wands are not strong enough and are sometimes flattened by motorists.
- It was stated that wands are not always visible to motorists, particularly at night, and that they therefore need to be made much more visible.
- There were also concerns expressed that if a motorist loses control of their vehicle and a cyclist is between the wands in the road and the bollards on the pavement, the cyclist cannot easily get out of the way and their safety would therefore be at risk.
- Due to the above concerns, it was felt that a physical separation would be much better than wands. It was also asked whether it's possible to widen the road to allow for physical separation.
- CoL acknowledged these concerns and stated that the design will be run through a stage 2 safety audit, but explained that widening the road is not possible due to the Transport for London ventilation shaft on the other side of the road.
- Wherever the cycle docking station for hire bikes is relocated to, make sure it's well away from any pedestrian crossing. Cheapside was provided as an example of why this is an issue: there's lots of cycle parking overflow at the docking station there, which obstructs the tactile paving at the pedestrian crossing.

Key changes -

Coach bays:

- There was concern about how, if coach bays are further away from St Paul's Cathedral, tourist flows could affect pedestrian comfort levels, particularly for wheelchair - users and mobility - impaired people. It was asked whether any studies had been done on the impact of this.
- CoL explained it is liaising with St Paul's and the Victorian Coach Company and investigating the availability of coach parking at Tower Hill.

Taxi bays and drop - off bays:

- It was stated that it's important that both taxi bays and pick up / drop off bays aren't relocated further away from key locations, as some mobility - impaired people or wheelchair users may not be able to walk or wheel very fast or further. It was suggested that the bays should not be relocated any further away from key locations, and should preferably be relocated closer to them if possible.

Public space –

Access point to Bank of America to be retained:

- There was concern about how this junction is currently a shared space and that this part of the design seems hazardous. Avoid shared space by differentiating between the road and the new pedestrian square.

King Edward Street looking South & towards Christchurch garden:

- It was expressed that it looks like there's a lot of space for seating, however there's not a lot of seating in the images shown. There is demand for more seating in public space, and it was highlighted how in this area around St Paul's, many people like to sit outside and eat lunch.
- There was concern around how this could be a prime area for skateboarders to congregate, which could be deterred if the area had a lot more seating.
- There was positive feedback around the idea of more public space and greenery, and it was suggested that the use of space could be optimised

more and that more interest could be added, such as through the use of water features.

- The importance of accessible seating was expressed, including a variety of seating types with arm rests, back rests, single seats for neurodivergent people, accommodating wheelchair - transfer, allowing people to sit alongside friends, tables for people to use, including wheelchair users, etc.
- There is interest in knowing more detail in what is planned for different seating options, quiet spaces and sensory gardens. There were questions around whether City of London are taking the Publically Available Specification (PAS) 6463 'Design for the Mind - Neurodiversity and the built environment' best practice guidance into consideration when designing sensory elements.

Other feedback:

- There was positive feedback regarding City of London explaining that they are doing everything possible to avoid shared space, as it was felt that this is critical.
- Members were reassured that there are no plans to reduce or relocate Blue or Red Badge parking bays in the area.
- It was discussed that in the past, when CoLAG had the opportunity to look at Equality Impact Assessments (EqIAs), they'd often find that they had been written by non - disabled people and had contained mistakes and omissions. It was asked whether it's possible for CoLAG to have a role in writing the EqIA when it's redone. CoLAG was able to comment on previous EqIAs and have their comments included. CoL will check their processes, as they are governed by these, and their EqIAs are normally conducted by a neutral party. However, they are happy to look into whether CoLAG can comment on a draft version of the EqIA.
- This project is very close to Postman's Park and only one of the entrances there is accessible, which is the entrance opposite St. Bart's Hospital. It was asked if the other entrance on St Martin's Le Grand could be made accessible, as it was described as currently being a couple of crumbling stone steps.

St Paul's Gyratory Transformation Project: External Stakeholders Consultation Feedback

Introduction

The City of London Corporation (CoL) are planning a transformation of the streets between the former Museum of London roundabout and St. Paul's Underground station, with an aim to make the area feel safer, less traffic-dominated for walking, wheeling and cycling, and a greener and more pleasant environment for all.

The project is currently in the consultation stage, with public consultation through online surveys and drop-in meetings.

As part of the consultation stage, The City of London Corporation commissioned Transport for All to facilitate a consultation session, with external stakeholder groups, representing various disabled and older people, on the 29th of September 2023.

During the session, the proposed changes were presented by the City of London Corporation, whilst Transport for All facilitated and gathered feedback provided by representatives of external stakeholder.

External stakeholders who were unable to attend had the opportunity to provide feedback in writing instead. The collated feedback presented is a summary from both the consultation session and written feedback. The feedback has been ordered in line with the presentation.

People present at the consultation workshop:

- Neil West – Project Manager, City of London (Presenter)
- Zaineb Hadi – Associate Consultant, Transport for All (Facilitator)

- Fran Springfield – Co-Chair, **Chronic Illness Inclusion**
- Tony Tuck - Secretary, **Greater London Forum**
- Kay Inckle - Campaigns & Policy Manager, **Wheels for Wellbeing**
- Jordan Moussavi - Dementia Friendly London Officer, **Alzheimer's Society**
- Keith Cranwell - Panel Member, **Alzheimer's Society**
- Gillian McCarmack - National User Group member, **Shaping Our Lives**

Stakeholders who could not attend and provided written feedback:

- A representative from **Deaf Ethnic Women's Association (DEWA)**

Feedback

Vehicle routes:

- **Tony (Greater London Forum)** thinks the overall traffic management plan appears to be a huge improvement. He stated that it's most important that the people who manage buses are happy with this proposal as most of the people passing through here will be on buses. This area is more of a go through area, so traffic needs to be kept open and free and these plans appear to do just that. He raised concerns about crossing cycle tracks, particularly when reaching bus stop islands, and that these will need to be controlled during peak hours.
- **DEWA (Deaf Ethnic Women's Association) representative:** It is important to consider people's access route from St Pauls travelling to nearby hospitals. What impact will these changes have on the traffic flow?

Public space -

King Edward Street looking south:

- **Kay (Wheels for Wellbeing)** asked if there will be a cycle path through this space. **Neil (CoL)** answered that the proposal is for a no cycling area but that there is a cycle path very close by.
- **Kay** stated that it's important to remember that for some disabled people, their cycle is their only mobility aid, therefore creating a no cycle space would prevent access for lots of disabled people. **Wheels for Wellbeing** advise to

instead state no cycling unless it's a mobility aid, and the expectation would be that you would move through that space at walking speed, just as you would if using a mobility scooter or wheelchair. She gave the example of how this has been rolled out on Wandsworth Bridge.

- **Neil** stated they will take this on board and **Kay** advised that they have other examples they can share where it states no cycling except disabled cyclist mitigations have been put in place.
- **Kay** said that it's important that the choice of surfacing does not cause access barriers for wheelchair and cane users, even if the surfacing is not necessarily pretty.
- **Gillian (Shaping Our Lives)** also raised access concerns in relation to surfaces and mentions that working dogs should be kept in mind. The flooring appears to be one of the main access barriers she faces in London, as depending on the type of flooring, it can make electric wheelchairs stop if it thinks you would be going over something. Therefore, Gillian has to use a manual wheelchair in London a lot of the time to avoid getting stuck.
- **Gillian** said that with newly built areas, there is usually uneven flooring and said it's important that this is avoided.
- **Gillian** suggested the use of tactile paving to warn and guide blind and visually impaired people away from hazards such as trees, water features, etc.
- **Kay** raised that the maintenance of surfacing is also an issue as, if for example there are slabs installed and it is used as an event space that will have delivery trucks, PA systems and other heavy equipment dragged over it, these slabs will easily crack causing the area to become inaccessible. Tarmac, albeit not pretty, is much more accessible. Usability needs to be a priority rather than the visual appeal.
- **Fran (Chronic Illness Inclusion)** raised that many of their members can only walk short distances and then need to sit and rest for extended periods of times before continuing walking. She asked how much seating there will be and whether there will be seating signposted for use by disabled people only as this would be beneficial to their members.

- **Tony** argued against the use of designated seating for disabled people in a public place as this would eliminate the human interaction of people offering seats to those who need them.
- **Fran** asked whether there will be accessible parking if there are events in this area and to reach other local landmarks. Fran often doesn't go to events as she can't park anywhere near them and would sometimes have to park up to half a mile away and then use a wheelchair for some distance to reach said destination, which is difficult for her to do.
- **Neil** explained that they will not be reducing blue badge parking and will be reviewing the demand and looking at potential locations for more blue badge parking spaces.
- **Tony** asked if there are figures for footfall in the area for different times of the day. **Neil** confirmed that these are being monitored and that assessing options to widen footpaths and crossings is based on the demand, as well as clearing obstructions as some footways are wide enough but cluttered.
- **Tony** said that if a clear open space is created then it may attract office workers during lunch breaks which is a positive thing.
- **Keith (Alzheimer's Society)** mentions that the route to and from St. Bartholomew's Hospital and usage by patients is important to consider. He also stated that lessening the amount of street furniture is important.
- **Keith** asked what sort of lighting there will be, especially during late afternoon, winter, etc. **Neil** explained that the lighting design is yet to be planned, however the lighting will meet all the standards and more, as this was similarly done at Bank junction.
- **Gillian** stated that she loves the idea of the sensory garden and that this is something that works well for her as someone with autism.
- **Keith** wanted to know how child-friendly the public space will be, how integrated this would be and whether there would be a play space, as this is important to consider in regard to intergenerational issues.
- **Keith** suggested a water feature.
- **Keith** stated that if there will be events held in this area, it would be beneficial to have raised seating.

New Change junction:

- **Kay** raised concerns about how it's not clear how cyclists using the bi-directional cycle lane on the right-hand side would be able to go left, and how cyclists on the left-hand side don't appear to have a cycle lane to use. After Neil explained how the cycle lanes would work, Kay stated that this needs to be very clearly signposted as, if it's a cyclist's daily route they'd be able to work it out, however, if you don't regularly cycle in the area this could be very confusing.
- **Kay** mentioned that the timing allowed for cyclists is especially important to consider for disabled cyclists as a safety and accessibility feature, because if not using an upright pedal bicycle, the moving off time will be much slower.
- **Tony** wanted to know if the central area between the three lanes will be a hashed area as this will be a great idea to stop traffic backing up when the lights change, and says that if it's not a hashed area, this will be a hazardous situation.
- **Keith** raised the importance of considering signage and direction finding to make the area more dementia friendly. An example was suggested of the use of yellow strips on the pavement to direct people to particular locations.
- **Keith** also pointed out the levels of anxiety that can be caused by noise and traffic through the areas.
- **Jordan (Alzheimer's Society)** pointed out that Alzheimer's Society feels strongly about dementia friendly design features, which can also benefit other disabled groups who have access requirements. There are some simple things that can be looked at such as clearly laid out signage and using different colours and strong contrasts so that people can navigate spaces more easily. Many of these things are fairly inexpensive to implement but can go a long way in helping people navigate that space.
- **Kay** pointed out that in the proposal image, there appear to be trees planted in the middle of the pavement which can cause accessibility barriers. Kay also raised the importance of ensuring the cycle parking is accessible, according to guidance.

St. Martin's Le Grand looking south:

- **Kay** stated these kinds of bus stops are very controversial, particularly for blind and visually impaired people. Some research was done by Living Streets that isn't yet published, looking at design interventions. There is no fully agreed resolution on this type of bus stop, however signal controlled crossings have been flagged as being preferred. However, these bus stops are still an unresolved issue.
- **Kay** stated that the width of the bus stop island is crucial. For people using a wheelchair or who have a guide dog, the area needs to be big enough to facilitate this.
- **Kay** said that if creating this type of crossing and with a wider bus stop island, she recommends monitoring user feedback as this would be good to know for future projects.
- **Tony** finds that there are three key issues for older people using these areas: people using electric scooters and bikes on pavements, electric bikes or scooters being left on the pavement, and the use of isolated islands for bus stops. Tony gave the example of this type of bus stop being introduced outside the new Battersea Power Station underground, and that it's very dangerous due to having a narrow cycle lane and narrow island. He raised concerns about cyclists neither reading or adhering to The Highway Code. He felt that any type of controlled crossing, including Belisha beacons or traffic lights, is a waste of time as half of cyclists will ignore them and go straight through. The danger will be minimised however never eliminated completely when using these systems.
- **Tony** mentioned that some other European cities have managed to find solutions, such as in Helsinki where they have good separation between pedestrians, cyclists and motor vehicles. He recommended that other cities schemes are looked at to figure out how to solve these issues.

Newgate Street looking east:

- **Kay** says that from an access point of view, separated cycle lanes are always preferred, both separated from vehicle traffic as well as from pedestrians.
- **Tony** thinks this design looks very sensible.

- **Jordan** stated that a lot of the issues he's encountered and that other cyclists in busy cities have encountered is the lack of separated areas and how unsafe that can feel for cyclists, as well as for drivers. He agrees that this design makes sense and that it has similarly been implemented in other European countries.
- **Gillian** asked whether people with accessibility needs have been to visit the site. **Neil** explained that they are working with the City of London Access Group (CoLAG), who are from the local area, and who have previously visited the site and that they will also be doing another visit.

Shared versus segregated surfaces:

- **Kay** advised that separated surfaced are always preferable and more accessible.

Controlled crossings versus uncontrolled crossings:

- **Kay** stated that controlled crossings are always more accessible.

Raised tables across side roads:

- **Kay** stated that with raised tables across side roads, there is debate around these as blind and visually impaired pedestrians can find this very confusing if there is not clear tactile paving indicating that they are moving from pavement to road space. Sometimes things that make ease of use for some disabled pedestrians can potentially make it riskier for blind and visually impaired people. She recommended to follow up with experts in accessibility for blind and visually impaired pedestrians to ensure this can be clearly demarcated for them.

Relocation of bus stops:

- **Kay** stated that from a cyclist's point of view, you don't want buses pulling in to cycle lanes to let people off on the pavement, but from a pedestrian's point of view you don't want to get hit by cyclists. It's important to consider the design and to do monitoring and evaluation and to invite some blind and

visually impaired people's groups to go and trial the bus stops and give feedback on how they experience it.

- **DEWA representative:** The bus stop positioning seems too far from St Paul's to nearby hospitals, specifically in relation to the onward journey for wheelchair users and those with ushers (people who are deafblind), visually impaired and those who are affected by longsightedness and short-sightedness.

Other feedback:

- **Kay** thinks that overall, the plans are very positive but the details are where accessibility issues usually occur.
- **Gillian** explained that, at crossings, the kerb needs to be completely flat, as if it's too high the wheels on her electric wheelchair automatically stop and this puts her in grave danger if in the road.
- **Kay** stated that the quality of the dropped kerb and tactile paving is also very important as these can be difficult to manoeuvre over for manual wheelchair users. Also, if tactile paving is badly installed, it presents access barriers for not only blind and visually impaired people, but also people who use wheelchairs, mobility scooters, etc.
- **Fran** agreed with the surfacing and tactile paving issues raised by Gillian and Kay.
- **DEWA representative:** The distance from the taxi rank to nearby hospitals will need to be considered. This will impact all Taxi Card holders.
- **DEWA representative:** I am surprised that wheelchair respondents only make up one percent of the replies. Disabled organisations representing wheelchair users are usually very vocal and I would have expected a much higher response. Despite wheelchair users being a small group of the whole voter number, your survey suggests that 89% of those asked approve the scheme. It is important to ensure public areas are accessible by all and so we ask who has been asked? Which organisations were involved to offer such a high approval vote? Who did the consultations involve? Importantly, which organisations and people were, perhaps, not consulted? It is important to

consider responses broadly to ensure the scheme effectively considers all parties.

- **DEWA representative:** It is integral that this project is fully accessible. This must mean that venues and facilities and places of interest are in proximity to each other. Routes should be easy to follow, and the ground flattened. Adequate seating should be made available between points and landmarks and everything must be clear and visible. Whilst consulting with relevant stakeholders, it is helpful to involve blind and deafblind peoples to offer their expertise when creating signs. They are best placed to advise what signs are easy to follow.
- **DEWA representative:** We do not recommend the introduction of artificial intelligence, as has been introduced at ticket stations. Robots cannot provide information or directions to deaf or deaf blind people.
- **DEWA representative:** Two of our members have recently given feedback that they find travelling to St Paul's station to be a very confusing, chaotic and stressful experience. They have explained that entering and exiting the station can be a tiring job and, without a support worker, they feel that they cannot navigate the space independently. They have recommended that the station is more visual and clearer with directions. The station should also be better staffed so that people with additional needs can be rest assured that a staff member is on standby to direct and support them in their travels. Our members have informed us that such a busy station can leave them feeling unsafe and vulnerable. These members have informed us that they avoid the station and tend to use a taxi to travel to St Paul's and this is problematic considering the impact of the cost-of-living crisis on people with disabilities. Making the station more accessible with visual signage will need to include consulting peoples with varying needs. This must include consulting peoples who are Deaf, blind, Deaf-blind, with Usher's, with learning disabilities and neurodiversity needs.