

OBJ3/P5/C1

Transport and Works (Inquiries Procedure) Rules 2004
Proposed London Underground (Victoria Station Upgrade) Order

LAND SECURITIES PLC AND OTHERS (Objector No. 3)

REBUTTAL PROOF OF EVIDENCE of HUGH BULLOCK of GERALD EVE

APPENDIX 1

[LETTER FROM TRANSPORT FOR LONDON TO LAND SECURITIES,
DATED 17 OCTOBER 2008]

Our Reference: 08/0517; 08/0518; 08/0519

Nigel Earp
Land Securities
5 Strand
WC2N 5AF

17 October 2008

Dear Nigel Earp

**RE Planning Applications 1, 2, 3 Victoria Transport Interchange 2
Westminster 08/08205/FULL; 08/08206/FULL; 08/08207/FULL**

Please note that the following comments represent the views of Transport for London (TfL) officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

I write in relation to our pre-application meeting on 03 October regarding your proposals for the redevelopment of land to north of Victoria Street, bounded by Buckingham Palace Road and Bressenden Place, submitted as Victoria Transport Interchange 2. More detailed comments are likely to emerge through the statutory planning process and the Stage 1 report to the Mayor. From our discussions to date it is understood that the redevelopment will involve the demolition of the existing buildings and construction of a high-quality mixed use development comprising some 82,300m² B1 office space, 12,700m² of A1-5 retail space 170 market residential units and 35 affordable housing units, together with other uses.

In principle TfL considers the development scale and use mixes to be broadly in line with the London Plan and it supports redevelopment in this location. However, the delivery of London Underground's Victoria Station Upgrade (VSU) is a TfL priority and an essential public transport improvement to provide the necessary transport capacity to allow intensification of the area. For this reason TfL will object to this application unless the necessary assurances (set out in detail below) are received by London Underground (LU). LU and Land Securities have been in discussion over many years and it is hoped that continuing this dialogue will lead to a speedy resolution of outstanding issues so that the project delivery and programme is not compromised.

In addition, highway capacity in the area is heavily constrained and TfL therefore wishes to work with you in an effort to ensure that any gaps or inconsistencies in the Transport Assessment (TA) are resolved and the necessary mitigation measures and transport

improvements are identified to ensure that Victoria becomes a safe, functioning and attractive environment.

The following comments have been produced in accordance with the pre-application stage of the planning process. It is our expectation that further comments are likely to arise as this development application progresses to formal Stage 1 comments and TfL expects that additional meetings will need to take place to discuss details of the proposals.

It is understood that three separate planning applications for three separate areas of the site have already been submitted to City of Westminster and that these had, in fact, been validated just before our meeting. As such, this meeting was clearly not 'pre-application', but the comments below are intended to address issues that are of concern to TfL. I would like to point out that though the fee for the pre-application consultation was received on 21 July, only a draft TA was received in early September and the scheme drawings and complete TA was not received until Friday 26 September.

The site is located within the Congestion Charge Zone and the highways surrounding the site form part of the Inner Ring Road/Congestion Charge boundary and are also part of the Transport for London Road Network (TLRN). The site has a public transport accessibility level (PTAL) of 6b, on a scale of 1 to 6b where 6b is most accessible. The site is well served by the public transport network, with easy access to national rail, Victoria, Circle and District lines Underground and 19 Bus routes. However, capacity on many of these services is severely constrained, which is discussed below.

On 03 October 2008 a pre-planning application meeting was held with TfL regarding the development proposals. The meeting included the following attendees:

- Camilla Ween TfL Land Use Planning
- Robin Gillis TfL Surface Transport
- Fergus McGhee TfL Surface Transport
- Henry Tihibikirra TfL Surface Transport
- Joel Adams TfL Surface Transport
- Dominic Hollen TfL Surface Transport
- Neal Giles TfL Surface Transport
- Shreekant Patel TfL Surface Transport
- Senober Khan TfL Surface Transport
- Nadine Reichel TfL Interchange
- Bryan Dobson London Underground
- Nick Street London Underground
- Deryck Povey London Underground
- Nathan Darroch London Underground
- Anne Crane TfL Group Property
- Graham King City of Westminster
- David Horkan City of Westminster
- Sean Dwyer City of Westminster

- Nigel Earp Land Securities
- James Waite Land Securities
- Mark Kelly KPF
- Paul Vivian Gerland Eve
- Roy McGowan SDG
- David Hart SDG

A number of issues have been identified following review of the TA and were raised at the meeting.

General Comments

Reliance carte blanche on data and analysis from the VTI 1 TA in the formulation of the VTI 2 TA is not acceptable and should only be relied upon where appropriate i.e. like for like.

There are references in the Transport Assessment (TA) to a TfL scheme for the Terminus Place area, including the closure of the bus station. At present TfL does not have such a scheme in place. However, TfL Interchanges Team is currently leading on a feasibility study to consider options for Terminus Place. This work will be complete in January 2009 and until this time TfL will not have a view on future changes to the public transport and interchange arrangements at Victoria. However, I should point out that TfL currently has no funding for any scheme at Terminus Place and its delivery will rely heavily on s106 contributions from developments nearby that will benefit from the transport and public realm improvements.

Trip Generation for various uses

The planning application sets out 4 development scenarios which are being applied for. In addition to these 4 development scenarios there are additionally 2 options for development scenarios 1 and 2. These result from different uses of the flexible space as either a D1 Library (option A) or A1/3 retail use and B1 office use (option B). However, separate trip generation figures for various use scenarios are not provided; therefore it is unclear what impact these different options will have on the transport network. Figures for each use should be provided and clearly set out within the TA.

Highway drawings

Detailed to-scale technical highways drawings of the existing and proposed highway layout should be provided. These drawings should indicate the location of Traffic Regulation Orders for existing and proposed situations. Vehicle swept path tracking should also be carried out for the proposed layout, including servicing vehicles and buses.

Pedestrian movement

Although much work has clearly been undertaken by Intelligent Space Atkins into pedestrian movement it is not clear how this has been used to inform the design of the development. There is little detail within the main text of the document or in the appendices which suggests what the pedestrian environment is likely to look and feel in

the future. Understanding the people movement aspects for this development and links to the wider pedestrian network should be a key consideration for this application. TfL requests further detail on pedestrian flows and volumes, with particular emphasis on the impact on the key pinch points and highway crossing points.

Growth assumptions

Section 6.78 assumes zero growth for pedestrians and motorcyclists. TfL questions this assumption and requests further information in support of it.

Significance criteria

TfL has concerns that the significance criteria set out in Table 7.1 understates the impact on the public transport and highway network. Increases in passenger and traffic usage in the table are not deemed to be significant until over 5%. However at a heavily congested location such as Victoria, even adding less than 5% more passengers or traffic is likely to have a noticeable and therefore significant effect on the network and its resilience to unplanned events. TfL would like to see further information to support this assumptions including providing absolutes for the network as well as percentages.

1 Relevant Policy

In terms of existing planning policy, the following should be taken into consideration:

- *London Plan (Consolidated with Alterations since 2004)* (February 2008)
- *The Mayor's Transport Strategy* (2001)
- *Land for Transport Functions* (London Plan SPG - March 2007)

2 Development Quantum/Trip Generation

Trip Generation

The formulation of trip rates for the retail element of the development is a concern. House of Fraser has been selected as a site for survey however this store does not open until 10.00. In reality the mix of stores which may be proposed within the development are likely to resemble the characteristics of the adjacent Cardinal Place development; these shops tend to open 08.00 which will result in additional peak hour trips. Clarification on this 'retail mix' would be helpful to support trip generation assumptions applied. The current uses of the properties on the site are largely restaurants, which will also have a very different trip generation/flow composition in comparison to the House of Fraser site. Clear justification of the choice of the House of Fraser site is needed and it is likely that a more comparable site selection will be required.

Trip generation has been calculated using the TRAVL database. TfL does not consider this to be the best practice method of calculating trip generation in this case. As the site is currently occupied, trip generation based upon site surveys should be utilised. It is noted from the TA that survey data was used to calculate modal split for the existing and proposed developments. Given this we do not understand why survey data was not used to calculate trip generation. The TRAVL data corresponding to the sites selected to assess trip generation should be provided in full.

It is stated in 6.15 that a 50% discount for internal trips has been applied but there is no justification within the document for this level. TfL requests a clear justification for the 50% figure.

9.30 states that 'it is estimated that servicing of Buildings 7b and 7c will require a total of 24 delivery vehicles per day with a maximum of 3 vehicles per peak hour (09.00-10.00). The peak hour is generally understood to be 08.00-09.00 and TfL requires details of the anticipated vehicles in the peak hour of 08.00-09.00.

3. Cycling & Walking

Pedestrians

The proposal significantly improves the pedestrian permeability of the site compared to the current layout, which is welcomed. TfL recognises that the alignment of the buildings has been arranged to address one of the key north south desire lines. This may be reflected in the future proposals for Terminus Place, and TfL wishes to work with land Securities to explore opportunities, but until TfL's feasibility work is complete this remains uncertain, so the VTP 2 scheme has to be considered in the context of the *existing* buildings and highways.

The proposed layout of VTI 2 will result in new focal points on the TLRN where there will be significant localised increased in pedestrian movements. Although the level of service assessment reflects this, there are no proposed measures to mitigate these increases. In particular, a new desire line across Victoria Street will be created adjacent to the proposed shopping arcade, which is not currently catered for by existing pedestrian crossing facilities. Also the footway width on Victoria Street needs to be considered. There are no proposals for catering for these issues through provision of a formal crossing point or other measures. TfL therefore requests that measures to mitigate increased pedestrian movement resulting from the proposal are explored to ensure safe movement of these pedestrians. Any such proposals will require junction analysis and modelling.

All pedestrian surveys are derived from the VTI 1 TA and use a 2006 Base Case. The TA argues that there has not been a significant change to the local pedestrian network in Victoria since 2006. TfL is unwilling to accept this assumption without a number of current validation surveys to support this conclusion. The TA should reference the work undertaken for VSU. This was carried out earlier this year and therefore represents the best data source available and the TA should therefore make reference to these surveys

Within the Intelligent Space Atkins report (Appendix F) there are a number of recommendations which are set out. However it is not clear from the application whether these have been taken forward as part of the development. For example, it is not clear if there are proposed mitigation measures for the Victoria Street / Buckingham Palace Road junction. The report notes that in the AM peak the crossing will need to be 8.0m wide to accommodate the flow (page 66) – is this proposed as part of the development? The report also states that the pedestrian crossing on the junction of Victoria Street and Buckingham Palace Road is predicted to improve in the 2021 scenario through a longer green man phase of 19 seconds in the PM period (page 70) –

is this proposed as part of the development? If so, TfL requires evidence of the traffic impact on the network.

Basement movement and accessibility

TfL wishes to discuss accessibility issues relating to the basement levels, in particular the location of cycle racks, disabled car parking spaces and loading facilities and the movement between these facilities and the accommodation and public realm above.

Cycling Hire Scheme

As was mentioned at the meeting, the Mayor of London has identified this development as a potential site for a docking station for the Central London Cycle Hire scheme that is being developed by TfL. This scheme is one of the Mayor's key priorities and he has announced his aim to introduce a cycle hire scheme in London.

"I will introduce a central London cycle hire scheme, so that Londoners will be able to hire a bike at convenient locations across central London. This will provide a genuinely sustainable alternative to the car and encourage more Londoners to cycle".

TfL wishes to discuss with you a possible location for this facility. The scheme is being developed as a transport mode; a more detailed paper is attached. TfL is currently considering a facility for 350 bikes with 595 docking posts, which could be spread throughout the site, including some located underground. I recommend that you arrange a meeting with German Dector-Vega of the Cycle Hire scheme, TEL: 020 3054 0354 to discuss this further.

General cycling issues

The Cycle Study which was produced as part of VTI 1 identified a number of cycle improvements in the area. TfL would like to discuss with you the potential of implementing some of the recommendations in that report, as part of improving cycle access to and from the site. The significant increase in provision for cycle parking associated with the VTI 2 proposals needs to consider the corresponding access, highway infrastructure and cycle route requirements to support this growth in cycling, which could potentially have serious adverse highway safety implications if not catered for.

A single central access for bicycles to the basement levels is unacceptable. This is likely to add additional time and effort onto people's journeys. This creates both journey time disbenefits and reduces the attractiveness of this mode of transport. Also TfL requires confirmation that residents are able to access the basement level from their properties and move their bicycles via lifts. Further, a single lift with a capacity of 6 cycles is insufficient capacity to cater for the volume of cycles and will generate long queues at peak times. A cycle ramp with continuous access would be a much preferable access solution.

More dispersed secure on-street cycle parking is needed across the entire development to aid short stay users and in particular at all public entry points, including from Victoria Street where none is currently proposed. This applies for all use classes.

4 Car parking

In the context of the highly accessible central London location of the site (PTAL 6b) TfL would have expected the promotion of a car free development. The implication of using car parking spaces at Cardinal Place for residential development at VTI 2 sets an unwelcome precedent, with adverse impacts for road network performance. TfL does not accept the argument that because there are a similar number of car park spaces at present and the network is already congested that therefore the impact of the proposed car parking is not significant. This approach is contrary to the current policy principle of promoting sustainable development for the future.

5 Highways

Concern arises over the apparent reduction in carriageways capacity at the junction of Bressenden Place / Victoria Street shown in Figure 5.4 which indicates 2 lanes travelling west/south instead of the current 3. Detailed to scale technical highways drawings are required so that this can be checked. If there is a proposed reduction in carriageway capacity then traffic modelling will be required, which would need to illustrate that this does not have an adverse impact on the Inner Ring Road and the wider road network at this location. In light of this uncertainty, TfL requests this be addressed as a priority, given the forthcoming Stage 1 report.

Section 5.22 of the TA states '*Bressenden Place would be realigned in order to accommodate the structural foundations of 6a and would provide potential additional off-side bus stands and coach stops/stands*'. It is not clear how Bressenden Place will be realigned as there is no text relating to this nor is there a clear highway plan. Further information is requested on this.

Network Management Act

Should this application be granted planning permission you are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the temporary and permanent scheme. Further, Network Planning's initial view of the scheme does not prejudice Network Assurance's final decision.

Furthermore, TfL has commitments as far as the Olympics Road Network (ORN) is concerned. It will be necessary to demonstrate that the temporary traffic management scheme and construction traffic do not compromise those commitments and have a negative impact on the ORN

6 Buses

The detailed layout of the bus lane and stopping/standing lay-by in Buckingham Palace Road will require further discussion with TfL to agree design details. As mentioned at the pre-application meeting there are serious concerns about trees being planted too close to the kerb and therefore TfL requests that it is confirmed that these will not

interfere with bus operation. TfL would also value further discussion in relation to passenger waiting facilities and pedestrian movement along Buckingham Palace Road.

London Buses recognise the need for additional standing space in Victoria and can confirm that they are likely to require the bus stands along Buckingham Palace Road as part of this development. This will mean that an adjacent driver toilet will need to be provided as part of the development.

During the pre-application meeting an assurance was given that the finished scheme will not restrict the operation of the bus station in any manner and that all bus movements currently possible will be possible once the development is complete. London Buses Services Limited would like this confirmed in writing.

While London Buses welcomes the extra stand capacity in Buckingham Palace Road and the continued access through Allington Street, it must be stated that TfL has not yet taken any decision on the future operations of buses in the Victoria area. As mentioned above, TfL is currently undertaking a feasibility study for Victoria Terminus Place, bus operations as well as all other modes in the surrounding area. This work will not be complete until January 2009. Until a decision is reached to make changes to bus operations in the area, TfL will require buses to continue to serve the Victoria Bus Station.

In addition to what has been requested under the 'highways' section TfL requests analysis of the impact on buses and general traffic of the VTI 2 proposal which should recognise the presence of VSU and other significant schemes in the Victoria area which will impact traffic flows and should amend assumptions from the VTI 1 TA where the layout/circumstances are changed in the new scheme/site layout.

7 London Underground (LU)

LU's key concerns are set out below, in two parts. In the first part the need for LU's Victoria Station Upgrade (VSU) proposal is considered together with the possible effect of the VTI 2 scheme on the delivery of VSU. The second part comprises comments by LU's Engineering Department (ED) on engineering, design and infrastructure protection matters.

7.1 The need for VSU and the possible effect of the VTI 2 scheme on the delivery of VSU.

LU's VSU Team has been working with your team for several years with the aim of ensuring that VSU and VTI can be delivered independently of each other and in such a way that the two schemes are compatible. VSU is important - specifically in regard to increasing the capacity of the public transport system at Victoria and generally to realise the full benefits of the Victoria line upgrade. Therefore, LU's position has consistently been that the delivery of VSU in accordance with the project's programme should not be prejudiced. LU is continuing to work with you to find a satisfactory solution.

VSU is an important part of TfL's investment programme and specifically it is important as regards (a) relieving existing serious congestion at the Underground station, (b) providing additional transport capacity to facilitate regeneration and intensification at Victoria and (c) fully realising the benefits of the Victoria Line Upgrade. It is LU's view that until adequate assurances or agreement with yourselves are reached, providing a solution that does not impact on the delivery programme of VSU, then TFL must object to your VTI 2 scheme as currently submitted.

The safeguards that LU considers necessary are:

- i. With regard to the physical interface between VSU and VTI 2, LU needs to be assured that the VTI 2 proposals do not conflict with or prejudice the safety of the existing or new infrastructure proposed (this is considered further in Part 2 below).
- ii. With regard to the practicalities of construction, LU needs to be assured that the programme and construction methodology for VTI 2 does not prejudice the delivery of, or cause any delay to VSU.

Until these safeguards are received to LU's satisfaction, it is TfL's view that the development should not be granted planning permission and TFL will object to the planning application.

LU acknowledges that VTI 2 would contribute to the regeneration of Victoria but if the scheme is permitted and built it would add significantly to the amount of floor space in the area and this combined with other growth expected at Victoria will increase trip generation and contribute cumulatively to the growing demand at Victoria. Increased trip generation will exacerbate the already-acute congestion at the Underground station and this will result in the duration of peak-hour station closures that already take place being extended. This gives further emphasis to the need to ensure that the safeguards referred to above are in place so as to ensure VTI 2 does not prejudice the timely delivery of VSU.

7.2 London Underground engineering issues

With respect to Blocks 7c & 7b

The proposals for these two blocks are on land proposed to be acquired by LU for the construction of VSU and in particular the construction of a new North Ticket Hall (NTH), together with tunnels and an escalator link to the Victoria Line (VL). Any development within this area cannot take place until after the completion of VSU project as the land will be required as a worksite throughout the VSU construction period. Further, any such development should be compatible with the VSU proposals in terms of layout, foundation details and loadings.

Building 7b is proposed to be located over the existing LU VL tunnels. In addition, the site of Building 7c contains an existing LU ventilation shaft. The means of draught relief from this shaft, into Bressenden Place, does not appear to be included in the application designs. This is of serious concern to LU. It must be demonstrated that a draught relief

facility into Bressenden Place is suitably incorporated into the building design at first floor level and above.

Any proposed development must also be designed and constructed in such a way as to not adversely affect the construction, maintenance and safe operation of the new infrastructure (i.e. the NTH and tunnels) and the existing LU infrastructure (i.e. the VL running tunnels, station areas, passages and draught relief shaft) and subject to a development agreement between LU and Land Securities (see detail below).

With respect to Block 6a

Similarly to the above, this block is proposed to be located on land needed by LU for the construction of VSU and is over the existing LU VL tunnels. Therefore, the proposed development should not commence until LU has completed its works or is in position to hand the land back to a developer. The proposed development must be constructed in such a way as to not adversely affect the construction, maintenance and safe operation of the new or existing LU infrastructure including VL tunnels, station areas and passages.

With respect to Blocks 5, 6b and 7a

The VTI 2 proposals include various sub-options as to how this part of the development might be co-ordinated with the VSU proposals. These include options for part of the VSU Paid Area Link (PAL) to be constructed either within the basement of buildings 7a and 6b or parallel to it. In either case, agreement and/or assurances are required by LU that the construction will not adversely impact the VSU programme (See above). LU is currently collaborating with you to examine these programming issues, but until they have been resolved LU will maintain its objection to the VTI 2 proposals.

Furthermore, the basement pile line for the VTI 2 proposals is close to existing District & Circle line infrastructure and runs parallel to the existing VL running tunnels. Once again any proposed development must be constructed in such a way as to not adversely affect the maintenance or safe operation of new or existing LU infrastructure including the VL tunnels, station areas and passages.

General Comments

LU considers that:

- i. Integrating part of the VSU paid area link within the VTI2 development is not a desirable option.
- ii. Wherever reasonably practicable proposed development should be constructed in such a way that LU assets are independent of the foundation and basement structures of any new construction.
- iii. LU Infrastructure Protection engineers must be involved during planning and construction stages to ensure the continued safe operation of the railway. The developer must contact LU Engineering Department Infrastructure Protection to discuss the works to be undertaken and the proposed foundation arrangements.

This will necessitate the involvement of Metronet. Surveys of the tunnels and the infrastructure protection process is chargeable to the developer.

- iv. Any development over existing or new LU infrastructure must be subject to a development agreement between LU and the developer and TfL's Land Disposal Policy.

8 Delivery and Servicing

Even though a servicing strategy has been produced as part of the TA, more detail is required on some mitigation measures to reduce and re-time delivery vehicle activity. A comprehensive and co-ordinated Delivery and Servicing Plan should be produced for the premises within the development. Examples of Delivery and Servicing Plan activity include:

- Measures to increase out of hours deliveries including engaging the receiver of the delivery to change their delivery time window
- Communication to freight operators of timing and location restrictions in place through a Legal Loading Plan
- A sharing of common goods or services across the development such as commercial waste collections in order to reduce delivery trip numbers
- Implementation of a vehicle booking system in order to manage the arrival of vehicles entering the underground area. Even though the TA has identified 50m of dedicated lane to access the basement, the requirement to security check vehicles prior to entering the site does have the potential to cause traffic queues, particularly at peak hour with 38 vehicle movements expected. Experience of a similar situation at Paternoster Square suggests a vehicle booking system can be used to plan delivery timings more effectively and reduce the impact of queuing servicing vehicles. This vehicle booking system would also ensure only 1 x 16.5m artic vehicle is on site at a time
- Demonstrate a commitment to Sustainable Freight Distribution through contracting the services of operators registered with a best practice scheme such as FORS
- Contracts could specify use of goods vehicles with more environmentally friendly engines, e.g. CNG, electric, hybrid or hydrogen fuel cells

Clarification of the vehicle height that can enter the underground servicing bay is requested.

Provision of an on-street legal loading facility that satisfies the requirements of the Health and Safety Executive for deliveries of kegs to the Duke of York public house is requested.

Further information is also needed in relation to how cash will be delivered and collected from the development, with particular reference to where cash-in-transit vehicles will stop to load/unload. Retail premises and any potential banks or ATMs will require cash movement and security issues need to be taken into account in order to design out crime and address Section 17 of the Crime and Disorder Act 1998.

Construction traffic on the Olympic Road Network leading up to and during the Olympics will be restricted.

TfL requires a Delivery and Servicing Plan to be secured through a planning condition.

9 Construction Management

You state that you have worked closely with London Underground to ensure that the two development schemes are 'compatible'. Given that VSU is planned to be in the construction phase when this development is programmed to start there will be a major interdependency between the two schemes. In light of this, Surface Transport has to assume a worst case scenario that both VTI 2 and VSU are under construction simultaneously. Although the TA states that the proposal would result in a less than 5% increase in traffic on the TLRN, it fails to recognise that the increase in movements will mainly be HGVs which carry a significantly higher PCU level. Therefore the actual impact will be over 5%. Furthermore, the worst case scenario would mean that the traffic management (TM) required for the construction of VSU will need to be assessed. Surface Transport is aware that the TM relating to VSU will result in significant road closures on the TLRN. The resulting loss of capacity on the TLRN will further exacerbate any increase in vehicle numbers generated by the VTI 2 proposal. Given this, it is fundamental that the VTI 2 TA takes full account of the VSU proposal and its related construction traffic generated and traffic management.

It is expected that any bus priority measures required during VSU construction, such as the Victoria Street contra-flow bus lane, will also be provided for the Land Securities scheme.

If construction of the VTI 2 scheme has a financial impact on London Buses due to increased journey times, etc then appropriate compensation will be sought from the developer.

Assuming that Victoria Bus Station is unaltered at the time of the VTI 2 construction works, then TfL requires buses to serve the bus station throughout the construction period.

It is encouraging that the TA identifies some measure to reduce construction vehicle activity. However, there are available a number of other tools and techniques that can be used within the development to further reduce the impact of construction activity on the surrounding environment and road network. A comprehensive and co-ordinated Construction Logistics Plan should be produced for this development. Examples include:

- Operational efficiency
 - Consideration given to the handling of deliveries before work begins on site
 - Vehicle booking/management systems. These are considered essential for sites generating a high number of delivery trips. Sites may also benefit from

- increased levels of security as well as using this tool to manage vehicle activity
- Enforcement of peak-hour restrictions and their method of implementation
- Communication to freight operators of timing and location restrictions and constraints in place through a Legal Loading Plan to ensure operators can conduct activities without breaking the law
- Measures to encourage out of hours deliveries (e.g. noise abatement strategies)
- Provision of appropriate staff training upon site and to operators delivering top site
- Facilities to enable the safe collection of refuse and recyclates to occur off busy routes and out of peak hours
- Procurement strategy
 - Demonstrate a commitment to Sustainable Freight Distribution through contracting the services of operators registered with a best practice scheme such as FORS
 - Procurement process should demonstrate an awareness of all vehicle activity associated with the site, its impacts and appropriate measures to reduce it
 - Contracts could specify use of goods vehicles with more environmentally friendly engines, e.g. CNG, electric, hybrid or hydrogen fuel cells
 - Main contractor or Client to encourage sub-contractors to source items locally, or from the same supplier
- Road trip reduction
 - Promotion of load consolidation using larger vehicles through consolidated ordering, provision of adequate unloading facilities and contract specification
 - Consider use of local consolidation facilities. These may provide a short term holding centre for materials which can be called on as required, or provide robust flow control to improve delivery success rates.

TfL requires a Construction Logistics Plan to be secured through a planning condition.

10 Travel Planning

TfL welcome the inclusion of a travel plan for the development. However, this should include **targets** for modal shift. The management plans are welcomed but TfL wishes to see more detail on the marketing strategy. Though the objectives are thorough, they could be a bit more site specific, rather than just referring to a 'central London' location. Monitoring - the initial travel survey should take place six months after initial occupation or after 75% occupancy, whichever comes first. Follow up surveys should then occur at one, three and five years after the initial survey. The use of itrace is welcomed.

11 Transport Impact mitigation – S 106

TfL notes that £59.8m is stated as being a '*Transport Financial contribution*' which is comprised of '*costs incurred by Land Securities such as construction costs and loss of development value directly arising from the Victoria Station Upgrade scheme.*' £20.9m is

stated as the value of public realm contributions and a further £1.6m is described as '*S106 contribution excluding public realm*'.

TfL wishes to consider this further but wishes to express its expectation that a S106 contribution will be made towards TfL's future plans for Terminus Place. As stated above, TfL will not know the outcome of the current feasibility work for this area until January 2009, and will therefore wish to discuss with the applicant appropriate contributions at that time.

Summary

TfL considers the development scale and use mixes to be broadly in line with the London Plan and it supports redevelopment in this location. However, TfL is concerned that this development could threaten the delivery of London Underground's Victoria Station Upgrade, which is an essential public transport improvement to provide the necessary transport capacity to allow intensification of the area. For this reason TfL will object to this application unless the necessary assurances mentioned above are received by London Underground.

Highway capacity in the area is heavily constrained and TfL therefore requests further analysis, design details and justifications mentioned above to reassure it that the development will not have an adverse impact on the public transport network, including walking and cycling. Also TfL needs to be satisfied that the construction impact on the highways is acceptable.

TfL wishes to see the inclusion of facilities for its Cycle Hire scheme within the development.

A S106 contribution towards Victoria Terminus Place will be expected, and will be discussed with yourselves once TfL's plans for the area are clarified in January 2009.

TfL believes that the key concerns can be addressed and that the VSU issues can be agreed. We look forward to working with you to find solutions to make this important site sustainable and deliverable. TfL is keen to continue discussion regarding integration of Terminus Place with your development and the wider Victoria area. Please do not hesitate to call me regarding any of the points raised in this letter.

Yours sincerely

Camilla Ween
Principal Planner – Master Plans
Land Use Planning

CC	Giles Dolphin Graham King Colin Lovell; Dick Halle John McNulty Peter Lynch	GLA Planning Decisions Unit City of Westminster TfL Land Use Planning TfL Surface Strategy TfL Interchange London Underground
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