

Victoria Interchange Group

Statement of Case: Summary

1. VIG supports the aims of this scheme. But clarification is needed on how the applicant will ensure that:

- a. The modelling on which it is based accurately predicts traffic levels including outside commuter peaks;
- b. Commuters will in fact volunteer to use the paid link and the northern end of the Victoria Line platform;
- c. The site above the northern ticket hall and other sites demolished during the scheme will be replaced by buildings of appropriate scale and style;
- d. The scheme makes provision for direct below ground access from the mainline station concourse to the south ticket hall and from the south side of Victoria Street to the northern ticket hall.

2. There should be a robust Construction Code of Practice covering, among other things, working hours and non-use of residential streets and a Liaison Group to ensure that the contractor(s) deal promptly with problems affecting the residential community.

3. The relevant transport authorities need to provide convincing evidence that adjustments made during the construction phase will work effectively, especially in the following respects:

- a. the road capacity, taking full account of the toll-free road, the increases foreseen in traffic, bus and coach numbers, and the Olympic effect;
- b. pedestrian movements from the mainline and Underground stations;
- c. the phasing of traffic lights at pedestrian crossings;
- d. the scale of bus movement in Victoria and bus dispersions, including a guarantee that current arrangements will be restored after the construction is completed;
- e. measures to prevent heavier use of residential streets in the conservation areas by traffic entitled to use the CCZ;
- f. satisfactory arrangements for taxis and private cabs to pick up and put down passengers.

4. A specific regime is required, based upon an impact study, to ensure that structural risks and other adverse effects of the construction process (dirt, noise etc) are not transferred from the applicant to the nearby residential community.

Victoria Interchange Group

Statement of Case in response to Transport and Works Act Order application from London Underground Ltd for Victoria Station Upgrade (VSU)

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Victoria Interchange Group

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Victoria Interchange Group

1. Formed by residents, the Victoria Interchange Group Ltd (VIG) is an unpaid umbrella group open to membership from Residents' and Tenants' Associations in South Westminster and to Affiliates who share the same aims. Over thirty groups, including the Cathedral Area Residents' Group, the Belgravia Residents' Association, FREDA (Pimlico residents) and Westminster Cathedral are involved in, or working with VIG. This Statement therefore represents the considered view of a wide cross-section of the 43,000 resident community identified in both LUL's 'Core Study Area' and the geographically smaller 'consultation area' described in the Report on Consultation (*Appendix A*). Statements of Case submitted by the Cathedral Area Residents' Group and Evelyn Mansions Residents' Association outline concerns for these residential clusters in detail.

1.1 Our aim in responding to planning and other applications in South Westminster/vicinity of Victoria Station is to provide the relevant authorities with a co-ordinated and detailed residents' response. To date, VIG has submitted comprehensive responses to planning applications for the LUL corner site development at Bressenden Place (now withdrawn) and the LandSecurities application for the Victoria Transport Interchange (VTI). VIG submitted Objections to the application on 16th January and 31st January, 2008 following consultations with our members and those groups who work with us.

General comment regarding documentation and status of residential

2. It will be apparent from what follows that VIG has used the information supplied in the application documents in an effort to identify the full range and extent of VSU construction impact on the residential community and those individual blocks, squares and streets disproportionately affected ('impact nodes'). This has been a difficult task since there are some 13 manuals and 4 books of plans to consult, with much overlap and repetition and some mistakes, all of which make for difficulties in absorbing and analysing the information. It is unfortunate that the documents filed in support of the application are in some respects already out of date (e.g. they remain predicated upon the grant of the planning application for the Corner Site even though that application was subsequently withdrawn by LUL in December 2007). The TWA process recognises as stakeholders ('Statutory Objectors') only those individuals or groups in the community whose land or rights in land, may be bought compulsorily under any TWA order. In practice this has meant only local landlords and commercial landlords operating locally are Statutory Objectors. The order sought would, however, have a marked impact beyond those who may be subjected to compulsory purchase: LUL's draft order seeks by means of permissions and opt outs to transfer much of the risk, in particular that of congestion, noise, dust and vibration during the construction phases,

to local residents. Moreover, the potential blight runs far beyond the boundaries of the various worksites and this should be recognised by this TWA process from the outset.

2.1 It follows then, that concentration upon compulsory purchase issues has inappropriately skewed the research priorities of those preparing information for the application: the resident community is viewed as secondary and has not been the subject of a dedicated impact study per se. Despite the fact that the VSU project will impact on a wide area of South Westminster (reference geographical definition of 'Core Study Area' for affected traffic flows for example, *para 3.1 p.9 Technical Appendix Vol 1*), we have had to 'second guess' whether some impacts have not been identified at all and, where they have been at least identified, whether they are sufficiently quantified or addressed. We are confronted with no option other than to take on trust that LUL will respect our objections and make best endeavours to satisfy our objections. We rely too, upon the City Council to represent our best interests and where they have an influence (in drafting codes and structures designed to mitigate the impact during construction phase for example), to exercise maximum leverage on our behalf (by securing sufficient resources so as to monitor and enforce those codes rigorously).

2.2 We have to record that consultation by LUL with residents directly or indirectly affected by this project has been wholly inadequate. Even residents acknowledged to be significantly affected, namely Evelyn Mansions, Carlisle Place, Cardinal Mansions, Carlisle Place and residences in Carlisle Place have only recently been given the opportunity to discuss their concerns with the applicant directly in one-to-one meetings – and at their request. As stated in our letter of 31st January, 2008, LUL's single meeting with VIG was characterised more by explanation than consultation. There have been no consultations whatsoever regards the implementation of phases A1-A6 (the utility diversions) which has started already (and about which we comment further in para 7 below). The consultation has therefore fallen short of what is needed. We note that Department for Transport guidance (*A Guide to TWA Procedures, 2006*) states that, "*failure to carry out adequate consultation or to take into account issues or concerns raised increases the risk of the TWA application not succeeding.*"

2.3 The application reveals throughout that the local community has not been treated as a separate and important consideration (compared, for example with the attention rightly given to the Victoria Palace Theatre), despite the fact that they will carry seven years of disruption and benefit least from a major London engineering project.

Introduction to Statement of Case

3. In principle we support the need for a VSU scheme. We are persuaded a good scheme is a necessary response to the passenger access and loading problems on the Victoria Line at Victoria, problems which will worsen if the projected increase of 10,000 per day in passenger numbers by 2016 materialises. We support TfL's proposition (as evidenced by the main funding programme) that a VSU scheme is the overriding priority for Victoria. We understand too that LUL wants to secure Consents as soon as possible to take up that main programme funding and guarantee

VSU scheme completion by 2015. To this end we support any LUL case for Compulsory purchase of properties and limitations on access which would enable LUL to 'cordon off' as much of the area bordered by Bressenden Place, Victoria Street and Buckingham Palace Road as necessary, so as to better work the site from within. This will help to reduce to a minimum the number of worksites, traffic movements between worksites and confine disruption, noise and dirt to as small a geographical area as possible. Such an arrangement would make for a safe system of working, protect better the residential amenity and increase the chance of project finishing to time.

The Working Assumptions

4. Whilst generally supportive of the LUL's reasoning and approach there are two crucial assumptions which need to be correct, for if either or both prove not to be so, the resultant scheme will not necessarily produce the required level of 'congestion relief that facilitates extra capacity on the Victoria Line' (*see para 7.5.1 J-39 Vol 4 of Technical Appendices*). And given that residents face seven years of disruption and inconvenience it is important the results justify our patience and forbearance.

First assumption - Modelling

4.1 This is standard modelling which relies upon Monday to Friday 'commuter peaks'. Lunchtime peaks, evening peaks and weekends (especially Sundays when The Mall is closed) of pedestrians, vehicles and transport users seem either insufficiently quantified or not consistently factored-in. Our concern that movements and passenger/bus flows at Victoria must be more complicated than a headcount at the usual commuter peaks is evidenced by it being a centre for commuters *and* seven-day-a-week shopping, evening entertainment and tourism – especially so on ceremonial occasions. There are subtle differences between the way these groups and regular commuters access tube and main line rail facilities and given the significant numbers in each group, scheme design may not reflect adequately the needs of all these groups. For example, more pedestrians access buses at Terminus Place on Sundays than on Saturdays and numbers accessing buses is high throughout the various weekday peaks (*i.e. 18,700 people - see p.73 T.A. Vol 1*). Material submitted in support of the LandSecurities' planning application for the Victoria Transport Interchange (VTI) identified 4pm of a weekday as in fact being the peak period at least for pedestrian flows around the underground and main line rail (*see p.19 VTI Pedestrian Modelling Stage 2b Report which predicts "It is likely between 5,200 (21% increase) and 7,000 (31% increase) more pedestrian movements in the area because of enhanced retail."*).

Second assumption - Take-up of and access to, the new paid link

4.2 There is little or no evidence presented in the application to demonstrate that mainline rail passengers will in fact 'volunteer' to use the paid link of a morning just to access the northern end of the Victoria Line underground platforms rather than either try to crowd down the existing bank of escalators to the southern end of those platforms or add to the pedestrian flows at surface levels. Indeed, such evidence as there is of commuter behaviour as street level pedestrians suggests that they especially will take the shortest route from A to B if they can, regardless of 'controls' and 'safety' (e.g. by walking round on the road side of crash barriers). There is in the

application neither measurement of how long a walk the proposed new paid link means for commuters, nor of their walk-time. In the absence of any scheme design features which make this walk-through either 'compulsory' or a more 'natural' route to take, the 'volunteer' assumption needs validating. In other words it should be more definitely established that this scheme will in fact, affect passenger behaviour enough to reduce substantially the worst overcrowding during morning peaks when waves of mainline rail passengers seek simultaneously to access Victoria Line northbound services for their journeys. How are passengers to be dissuaded from using (as now), the existing escalators to gain immediate access to the southern end of the platforms? Will this in practice still require manned supervision of movements and shutting off part or all of the station at peak times? How can this be done in the proposed configuration? How then, would the mobility impaired access the lift?

Scheme design – planned improvements

Above ground

5. The following planned improvements above ground seem sensible:

- The new entrance to replace the current Wilton Road stairs.
- The two new entrances to the northern ticket hall on the east and west sides.
- Widening of the Sussex side stairs.

Building loss and new builds

5.1 Whilst we are sorry for, but understand as necessary, the loss of 124 Victoria Street (*plot 50 of Plans and Sections Appendix*) we are nonetheless encouraged by the intention to save the characterful and recently restored buildings at Victoria Station Buildings (*plot 26*) and 181-183 Victoria Street from demolition.

5.2 We support and endorse the City Council's desire for LUL to carry out a review of highway and pedestrian issues at the 175-179 Victoria Street location (*plot 25*) and short and long term options for bringing forward a scheme to treat the gap which will result from the demolition of 175-179 Victoria Street (*see correspondence between WCC and the Secretary of State dated 16th Jan 08*). This site commands important prospects over Victoria Street and we note here that it is not LUL's case that what is eventually constructed is to any extent determinative of the viability (financially, technically or otherwise) of the Victoria Station Upgrade Project.

5.3 The recent TfL Planning Application for the corner site portal above the northern ticket hall was withdrawn. It is a matter of regret that the TWA application has come forward without a corresponding Planning Application for the new portal. This inhibits proper assessment of the scheme in its entirety (e.g. access, pavement crowding and emergency evacuation aspects). We support and endorse the City Council's view that the current LandSecurities VTI proposal for (*Building '7c' by Lynch Architects*) sets a suitably high standard of design quality and is appropriate regards massing and height (VIG supports in its entirety that paragraph from the City Council's Statement of Objection *dated 16th January 2008, second part of para1*). We ask the Secretary of State to attach a condition to any TWAO that the parties come to

final agreement as quickly as possible on a suitable planning application to WCC for that site (boundaries as defined in WCC's letter).

5.4 Additionally, it is in the interests of LUL to engender a feeling amongst residents and local business that at least the future of one site in this development-prone landscape has been competently settled (and see comments regards NR/LUL cooperation in *para 6.5* below).

Below ground

5.5 To cope with projected numbers (from 70,000 during morning peak to 80,000 by 2016) and subject to modelling assumptions being correct (4.1 above) the following already planned below-ground improvements seem sensible:

- The new northern ticket hall at the junction of Bressenden Place and Victoria Street.
- The enlargement of the existing Victoria Line ticket hall (south hall)
- Three new banks of escalators – three escalators per bank
- The new interchange tunnel between the north end of the Victoria Line platform.
- New lifts between street, ticket hall and platform levels for both ticket halls.

Scheme design – suggested improvements

6. Direct access to the northern ticket hall by pedestrian tunnel from the south side of Victoria Street.

6.1 Current pedestrian accident rates at the Bressenden Place junction with Victoria Street (north) and Carlisle Place junction with same (south) indicates a problem for pedestrians crossing Victoria Street at this point (*p.29 T.A. Vol 1*). Documentation in the LandSecurities VTI application indicated an increased load on this crossing from pedestrians exiting and entering the new tube portal (*'Intelligent Space' Report, p.33 stated pedestrian numbers massing outside the portal will average 4,400 ph rising to a maximum of 6,400 at peak times*). The designation of Victoria Street as 'Central Area Frontage' by the GLA's London Plan means pedestrian flows will be fed by both commuters and shoppers for longer periods during the day and pedestrian 'tacking' from south to north is set to increase (*see Retail Report submitted by LandSecurities for the VTI application*). All further complicated for pedestrians by a contra-flow bus lane at this point. Therefore, below grade access to and from the tube is needed under Victoria Street at this junction.

6.2 The assertion in the TWAO application that this is not technically possible is conceded not to be accurate in the detailed appendices (*T.A. Vol 1*) - if there is sufficient below grade space above the District and Circle line track for it to be crossed by the existing pedestrian underpass and by the King's Pond Sewer, there is sufficient space for a pedestrian tunnel from the new north ticket hall to the southern side of Victoria Street. What may not be possible is completely step-free access and whilst this is regrettable, it could still yield significant benefits since the great

majority of commuters are agile without luggage. Significantly reducing crowding at grade would also indirectly benefit the mobility impaired. This is an LUL scheme which LUL should build as a comprehensive whole and there are many stations on the LU network with this kind of entrance e.g. Oxford Circus and Piccadilly. Neither is it appropriate that LUL 'hold off' from this commitment unless and until redevelopment of the south side of Victoria Street makes additional funding available by some third party. That could mean the reappearance of a worksite at a much later date with all the consequent knock-on for traffic, noise and disruption for residents of the north western corner of the Conservation Area, especially Evelyn Mansions (at the north end of Carlisle Place). It is not reasonable or acceptable to leave local residents and commuters exposed to the risk of yet further disruption after enduring the substantial disruption already assumed in this application.

6.3 If the provision of a pedestrian tunnel from the southern side of Victoria Street to the new northern ticket hall would mean that it was necessary (for safety or engineering reasons) permanently to close off the southbound-only one-way vehicular entrance to Carlisle Place from Victoria Street and Bressenden Place, that is a cost which would seem a necessary one, as it was in Hans Place (next to Harrods) when Knightsbridge station was extended recently.

6.4 **An escalator link from the mainline station concourse to the southern ticket hall.**

6.5 We consider that there is on the face of the application an insufficiency of convenient access to the southern ticket hall (and consequently the paid link). To guarantee both management objectives, rail-to-underground commuters would benefit from provision of an escalator link from the Victoria main line station concourse to the Southern ticket hall/paid link. Reducing pedestrian congestion within the main line station is also an objective of Network Rail (*as evidenced by their Statement of Objection dated 15th January, 2008 para 3*) and beyond the station at grade for the City Council (*see the Victoria Area Planning Brief*). This would also benefit local residents. From the documents we can see no engineering reasons why the escalator link is not achievable. We consider that LUL and NR have not acted to remove whatever obstacles (including inertia or commercial) may be in the way of such a plan: a scheme as expensive and long-term as this must endeavour to offer a comprehensive answer to transport problems and it is not satisfactory that LUL or NR should fail to achieve this important element of the scheme. Additionally, if the projections in passenger growth are valid and Terminus Place is to remain functionally viable (with or without as many buses, with or without buildings) or as part of a developed VTI, more separation of rail-to-bus from rail-to-underground passengers is necessary - an escalator link would therefore seem to be an imperative. The existing pedestrian accident rate at Terminus Place (*see p.20 T.A. Vol 1*) speaks for this proposal as does common sense - i.e. the shared need of Network Rail and TfL to improve passenger experience of journeys. Just such escalator access arrangements are the norm and successful at mainline stations elsewhere for example, Paddington, Euston and Liverpool Street. A test which may assist the Secretary of State in this respect is to consider what would be done were the stations being built from scratch, in which instance it is perfectly obvious that escalator links would be provided from surface to underground platforms.

Short-term changes

Utilities

7. LUL has already commenced implementing phases A1-A6 (the utility diversions). The full effect of these works will be felt before any TWAO is granted. Consequently, LUL will not enjoy the exemption it seeks under the Control of Pollution Act and would have been well advised to agree provision with WCC, local business and amenity societies direct before requesting contractors to commence these changes. VIG already has concerns regards an insufficiency of measures (e.g. netting) to protect against noise and dust. Since the thrust of the reports filed by LUL is that significant effects will be limited and highly localised *both* during the utility diversion phase *and* the later construction phases, there is a contradiction in LUL seeking protection by way of exemptions for the latter. LUL should not be allowed by means of being granted the protection it seeks to pass the risk of significant effects onto local residents (and see *para 9.2* below).

Traffic routing

7.1 The application is correct in identifying the 'Core Study Area' for affected traffic flows as extending from:

(*north*) Belgrave Square, Royal Mews to Birdcage Walk across
(*east*) Victoria Street to Strutton Ground, through to Vincent Square, across Vauxhall Bridge Road and
(*south west*) over to Charlwood Road, and then to
(*west*) St George's Drive, to Elizabeth Bridge, Elizabeth Street, rejoining the *northern boundary* at Lyall Street and the southern end of Belgrave Square (*see p.9 T.A. Vol 1* for map).

7.2 However, we add a rider. In central London, traffic and pedestrian conditions within the zone are affected by developments and traffic disruptions just beyond the borders of the zone. LUL and TfL should recognise that seeking simultaneously to undertake both VSU and any part-pedestrianisation of Parliament Square is unrealistic. Priority needs to be given to whichever project is intended to deliver the greater public transport improvement.

7.3 The application correctly assumes that drivers regularly using part of this route to make their daily journey will have no choice other than to continue using it.

7.4 The application seeks to make temporary changes to bus, taxi and traffic routing during the long utility diversion and construction phases depending upon actual length of time and exact phasing of closures. Some of these are contentious (*see para 7.9 and onwards below*).

7.5 We are concerned that both the partial closure (Phase A1 from March 2008 through to end phase A4 April 09) and then complete closure of Wilton Road (Phases A5/A6 May 09 to Sept 09 – *see pps 203-209 T.A. Vol 1*) to private and taxi vehicles results in diversions via Neathouse Place/Bridge Place/Eccleston Bridge and Buckingham Palace Road – all part of the Ring Road (North) and toll-free. This also results however in an estimated increase of 260 passenger car units in Eccleston Street north of Buckingham Palace Road (*see para 6.2.11. A-18 T.A. Vol 1*). We are

concerned for that quiet and narrow residential amenity sited close to Ecclestone Bridge/Belgrave Road/Bridge Place junction exit (i.e. Hugh Street, Ecclestone Square and then part of Belgrave Road) who will probably find their 'corner' taking a lot of that passenger car unit increase (a significant part of which will also include delivery vans and HGV's (i.e. up to a 17% increase - see fig TX6.3 p.A-20 T.A. Vol 1 and elsewhere). Before any diversion takes place, it needs to be demonstrated convincingly that:

- the 'potential improvements' mentioned as mitigation in para 6.2.42 of the Environmental Statement will enable this junction to take all the traffic diverted, plus the extra traffic generated by the toll-free route through Victoria and the extra taxis foreseen to be using Hudson's Place or the air deck;
- Ecclestone Bridge (which spans several railway lines) is strong enough to take that traffic,
- The traffic lay-out will make it impossible for traffic turning right out of Bridge Place onto the Bridge to go straight ahead into Hugh Street.

7.6 We are similarly concerned that residents within the Cathedral Conservation Area will be adversely affected by traffic impacts. The Carlisle Place north entrance, leading to Morpeth Terrace (one-way south) will become a new 'rat run' for Congestion charge payers (and in any event, taxis) escaping congestion on the Vauxhall Bridge Road either from Victoria Street south or across from Bressenden Place. It is not clear that all worksite traffic (i.e. including smaller delivery and maintenance vehicles) will be prohibited from using minor roads. It is noted that the application as it stands does not seek powers to effect closure of Carlisle Place either on a temporary or permanent basis. This should be a matter for consideration. An adjustment here would certainly be necessary if the question of an underpass to the northern ticket hall is resolved (as requested, see para 4.3 above) in favour of one being built sooner rather than later.

7.7 Furthermore, whilst it is understood that the impact of construction traffic cannot be fully factored in at this stage (since the contractor is still subject to tender) and the contractor's lorry route may to some extent depend on the geographical location of his disposal site, it should be noted that VIG believes the application reveals of the order of 20,000 lorry trips for muckaway alone (see para 14.7.1 p.79 T.A. Vol 1), and hence an additional and considerable burden on the area from construction traffic. Just as for our request to protect the Cathedral Area it is essential that all worksite traffic is prohibited from minor roads.

7.8 VIG looks to LUL to conclude agreement urgently on the use of the City of Westminster's Code of Construction Practice (CCP) to mitigate the environmental impacts of the construction of the scheme and especially the traffic impacts (on for example refuse collection and delivery of goods and services to residential areas). VIG further supports and anticipates endorsement of WCC's suggestion of a Liaison Group (last para of City Council's Letter dated 16th January, 2008), to include local residents to address issues of common concern and identify solutions both before, and during works. Residents would also wish to be included in shaping that Code in the first instance (and see also Cathedral Area Residents' Group Statement of Case p.9 paras 6.3).

Taxis

7.9 We are concerned at a methodology which relegates taxis to the same status as private cars (as evidenced by their exclusion from Wilton Road during works). This approach insufficiently recognises the special place of taxis (including private taxicabs) in the life of those city dwellers and visitors having made the 'lifestyle choice' to rely upon public transport generally and need a taxi on those occasions when personal transport is necessary, especially to the West End and City. Whilst we note the suggestion that some pick up and set down facilities are made at Hudson's Place and at the station's west exit on the Buckingham Palace Road (*para 6.2.90 A-40 T.A. Vol 1*), the scheme offers no alternative for local residents and many others transiting Victoria having to trek to the air-deck for reliable taxi availability (and note comment in *Table 8-1 p.153 T.A. Vol 1* '*signed diversion of taxi passengers to alternative facilities but distance is significant*'). Such an arrangement would add to the already high cost of using taxis in Victoria. It would also seriously complicate pedestrian flows within the station with even more people trying to cross the concourse in competing directions. We are somewhat surprised that NR has not highlighted this problem in their Statement of Objection (dated 15th January, 2008), given its concern that pedestrian flows within Victoria Station "*be satisfactorily and safely maintained*".

7.9.1 It is also of concern that should conditions generally become hostile for taxis (and notwithstanding any U-turn arrangements on Buckingham Palace Road) and journeys to the City or East of the West End become an ordeal – cab drivers will 'vote with their feet' and central Victoria become a very difficult place to find a taxi. It is suggested that TfL consider alternative sites for a cab rank *in addition* to the airdeck cab rank.

7.9.2 We are concerned that TfL should not give precedence to lay-over facilities for buses at the cost of proper provision for taxis.

Buses

7.9.3 Any VSU scheme depends on provision being made for keeping the public transport service going throughout construction. After the trains, the most significant element of public transport is the buses (rail-to-bus, underground-to-bus and bus-to-bus transfers at Victoria alone number some 18,700 people at peak times *see reference earlier*). There must be a workable scheme to enable bus services to continue during *all* phases of VSU construction. However, what LUL's application does not demonstrate, is that there is as yet agreement within TfL between LUL and London Bus Services Ltd as to how that is to be achieved since, with the exception of a specific suggestion for revised set down and lay-over arrangements for bus routes C1 and C10 (*6.2.55 A-32 T.A. Vol 1*) the application is deficient on detailing the number of and arrangements for, other routes. *Paragraph 6.2.117 A-45 of T.A. Vol 1* merely states:

"The area of the station forecourt, bus station and Terminus Place will be constrained by worksites during construction. Inevitably some temporary adjustments to the existing operations will be required, including the temporary diversion of some bus services away from the bus station, thereby easing the situation for the services that remain."

and the accompanying chart states “*Until strategy for mitigation is agreed with stakeholders there remains a significant effect*”.

7.9.4 The proposal in the recent LandSecurities VTI planning application for the permanent removal of buses from Terminus Place remains a highly contentious issue locally. VIG continues to oppose decentralising bus arrangements from a dedicated ‘garage space’ (i.e. Terminus Place) onto neighbouring Roads (i.e. Vauxhall Bridge Road, Grosvenor Gardens and Buckingham Palace Road). Apart from the inconvenience of long walk times for travellers, bus manoeuvres and lay-ups degrade the residential amenity and would add to the already high level of traffic congestion on these toll-free roads. Given the anticipated expansion of the articulated fleet (Victoria is already home to 25% of that fleet) and increase in bus frequencies for other routes using Victoria (*see also TfL’s doc “transport for London 2025” identifying that bus numbers are back to 1950s levels* - but note, in 2008 road conditions), we have asked TfL to undertake a wholesale review of the 19 routes which pass through Victoria (and especially the 11 terminating routes which use Terminus Place) before seeking any undertaking from a Planning Authority to close Terminus Place – either permanently or temporarily. TfL however, appear to favour the removal of buses from Terminus Place onto the surrounding streets.

7.9.5 We are therefore concerned that the mechanism of this TWAO should not be used to advance this agenda, even on a temporary basis (since this would anyway be for a considerable period), thus effectively by-passing normal planning procedures and extending the geographical limits of the Interchange by default. We request that the Secretary of State direct that any Order which would permit changes of bus routing and lay-over arrangements during the period of works should be subject to strict conditions that they do not lead to permanent changes without that wholesale review and going through proper consultation and consent processes.

7.9.6 We note that the closure of Allington Street will affect the smooth passage of buses (6.2.57 A-33 Appendix 1) but are concerned that the solution (a proposed contra-flow bus lane in this part of Victoria Street) will increase significantly the risk to pedestrians. There appears to be no assessment of this risk and hence, any mitigating measures. We need to be assured that this will not adversely affect traffic light phasing, especially at the congested Bressenden Corner /Victoria Street junction (and see para 6.1 above).

7.9.7 The problem of accommodating buses from a disrupted Terminus Place during construction works is compounded by a need to relocate even more bus stops and stands because of the closure or partial closure of Wilton Road for long periods (*see T.A. Vol 1 p.216*).

7.9.8 We reiterate - TfL has the prime responsibility for ensuring viable traffic conditions during construction. VIG looks toward TfL’s *road* managers for authoritative reassurance that the road system will cope and to TfL *bus* managers not to compromise this.

Pedestrian flows

7.9.9 We are concerned that optimum solutions for directing pedestrian movements from main line rail/tube exits across worksites at each stage of the works, east across to Victoria Street (north and South) are still poorly worked through. This is tacitly acknowledged in several places in the documents and particularly impacts upon local residents (see *Issues to consider Table 1 K-3 T.A. Vol 4* where it states “access routes between residential areas and Victoria Station complex” and “access routes between residential areas and community facilities” still need consideration). Effectively, local residents could experience a sense of being ‘cut off’ from central Victoria and their habitual pathways toward the City and West End for some considerable time (see also Cathedral Area Residents’ Group *Statement of Case* pps 4 and 5 and paragraphs 4.4 – 4.7 concerning pedestrian connectivity).

7.9.10 Furthermore, the combination of confused and changing arrangements on Terminus Place, uncomfortable narrow footways around the worksites and a possible new exit for rail passengers ‘somewhere south of the existing Wilton Road access’ (6.2.43 A-29 T.A. Vol 1) could combine to have the effect of forcing many train passengers to use the narrow exit to the Southeast of the Station – into Wilton Road, (and see 6.2.117 A-45 T.A. Vol 1) and would be contrary to the emphasis placed by NR on Terminus Place being protected as the main entrance to the Station – (see NR *Letter of Objection 15th January, 2008*). This will likely increase footfall across the Vauxhall Bridge Road (by the Queen Mother’s Sportshall – an already pedestrian-unfriendly crossing – or, by means of the slow two-stage crossing, by Neathouse Place) and commuters will then press on into the Cathedral Conservation Area via Francis Street to reach work destinations on the south side of Victoria Street, using one of a choice of four residential parallels (Carlisle Place, Morpeth Terrace, Ambrosden Avenue or Thirleby Road). This phenomenon has not been identified, assessed nor mitigating measures identified for this normally quiet residential area.

7.9.11 Following a recent pedestrian fatality at the crossing with Grosvenor Gardens we are further concerned about pedestrian walk times generally (and see Cathedral Area Residents’ Group *Statement of Case paras 4.5-4.7 for the local demographic profile and schedule of concerns regarding particular crossings*). The Application is based on an overriding need to keep traffic moving during the construction phase (as evidenced by, for example para 17.8 p.115 T.A. Vol 1) and this needs to be balanced by a Pedestrian Management Plan which determines that any traffic management scheme does not accept a higher accident rate for pedestrians. In short, plans

- Must not compromise pedestrians by further shortening walk times at crossings and,
- Must guarantee that light phasing (frequency of green man times) at crossings (including new ones) meet and do not depart from DfT national guidelines.

Conservation Areas

8. Whilst there is description of the two Conservation Areas adjoining the VSU site (paras 4.3.35-37 E-30 T.A. Vol 3) we are disappointed that it relies on secondary sources for material (much of it dated) and that there is no investigation of the VSU construction impact on Grosvenor Gardens and the Cathedral Conservation Area per se. This casual approach may have arisen because of the high concentration of

Conservation Areas in Westminster (54 areas in total) many adjoining commercial or transport sites. However as time passes and buildings become 'classics' and adjoining sites are developed, the Conservation Areas become more worthy of protection as evidenced by the WCC 2008 draft Audit of the Cathedral Conservation Area for example (*and see Cathedral Area Residents' Group Statement of Case* which is testimony to a considerable civic pride and notes that in addition to Grade 1 and II listed ecclesiastical buildings, that the area has a considerable number of unlisted buildings of merit and a rising resident population - *paras 2.1-2.3 p.2*).

8.1 We cite here one small example and a more general example of an attitude which does not acknowledge properly the special status of Conservation Areas:

- TfL seems content to 'load further' the trunk roads on the borders of Grosvenor Gardens with set-down for bus routes C1 and C10 (*para 6.2.55 A-32 T.A. Vol 1*). It is not acceptable for TfL to degrade yet further the open space of the Gardens (the only green space open to the public in this area) and the residential amenity in this way.
- The documents supply information about the cumulative effects of development locally (most especially a VSU and a VTI). It concludes "*There will be no cumulative effects*" during demolition and construction on the community (*see Table 7-4 7-25 Main Report*) whilst at the same time stating that 'Scheme Significant Residual Effects' have not been assessed! This is perverse and irrational and underlines the need to make sure, before any consents are given, that all impacts on the residential community have been considered, assessed and mitigated.

8.2 This reinforces the case for LUL to undertake a comprehensive impact study on residents (and the three schools in the vicinity) before securing an Order (and again *see para 9.2 below*).

Impact nodes within the residential area

9. Traffic, noise and vibration from construction and dust problems have been identified to affect the following streets/buildings to one degree or another (*see k-31 to K-34 Table 9: T.A. Vol 4 and para 5.7.2 E-49 T.A. Vol 3*):

'Key receptors' to the construction phase are identified as

- Evelyn Mansions
- Carlisle Place
- Carlisle Mansions
- Allington Street
- 20 Palace Street
- parts of Victoria Street
- parts of Vauxhall Bridge Road

Additionally:

- Victoria Square
- Ecclestone Bridge
- Hugh Street
- Parts of Belgrave Road
- Part of Morpeth Mansions
- Part of Ashley Gardens
- Cardinal Mansions

Are variously identified elsewhere in the documents as receptors to traffic disturbance, dust, airborne noise and loss of visual amenity.

9.1 The effects of night working and vibration on specific residential blocks (key receptors listed above) in close proximity to the North Ticket Hall construction site (opposite the entrance of Carlisle Place) are still unclear. Evelyn Mansions (Carlisle Place) alone has been given an 'explanation session' by LUL and at the time of writing VIG anticipates a response to its earlier request (see *Letter of Objection dated 31st January, 2008*) requesting specific mitigating measures for any financial losses incurred by Evelyn Mansions' residents as a result of the workings. Steps need to be taken to inform and protect residents of other blocks nearby which may be affected.

9.2 VIG rejects any attempts to have the risks associated with the work passed to the freeholders of blocks such as Evelyn Mansions and individual residents of those blocks direct and accordingly notifies the Secretary of State that any TWAO should attach the condition that these residents receive a package of mitigating measures which include (in each case at the election of individual residents, so that risk remains with LUL):

- Proper assessment of and monitoring for any effect in the change of ground water levels on basements (*see para 2.5.8 E-6 T.A. Vol 3*)
- Payment of any increased block and household insurance
- Offers to provide payment for secondary glazing of choice and deemed suitable for dwellings within a conservation area
- Payment for regular window cleaning of flats and common parts
- In the event of significant soiling paying for cleaning and/or repainting work as appropriate to affected elevations of the building
- Payment for an independent surveyor to monitor and assess for structural damage caused by vibration and commitment to pay for any reparatory works arising subsequently and for a period of years (to be agreed) subsequently
- Offer to re-house residents in compatible accommodation for the duration – those residents opting for this on a self-selecting basis
- Financial compensation for any property blight that can be objectively assessed against agreed criteria.

9.3 Additionally, residents of Carlisle Mansions, Carlisle Place and Ashley Court (Morpeth Terrace) will want assurance (by objective and measurable means) that any long-term damage will be identified and compensated. All blocks listed will want an explanation of what is meant by LUL's 'further mitigation policy to address residential occupiers.' (*T.A. Vol 3*).

General conclusion regards impact on residents

10. There are general (not evidence-based) assumptions made about the long term benefits of the VSU for residents. Consequently the information needed to come to a settled view about our position is either (i) not there (ii) dispersed throughout the documents or (iii) wrong. To redress this we ask the Secretary of State to require LUL to commission Mott MacDonald (or some other competent agent) to produce a coherent assessment of the impact on the residential population addressing particular aspects and particular groups of residents: this should be done as a condition of any such Order. Only in this way can LUL's responsibility to produce a 'mitigation policy to address residential occupiers' be discharged properly.

Summary of Requested Pre-Conditions:

The scheme should not be commenced until:

- 1. LUL settle on a suitable Planning Application for the corner site and for 175-179 Victoria Street.**
- 2. LUL include a pedestrian underpass from south side of Victoria Street to corner portal.**
- 3. LUL/NR conclude a satisfactory plan for escalator access from the mainline Station concourse to the southern ticket hall.**
- 4. LUL conclude agreement to the WCC Construction Code of Practice (to include a Pedestrian Management Plan) and establish a Liaison Group.**
- 5. TfL and WCC confirm that the road system, as constrained by the proposed works will be capable of taking the predicted increase in traffic and any extra growth resulting from the works themselves.**
- 6. LUL produce a clear and acceptable plan for buses with which LBSL publicly agrees to comply.**
- 7. LUL commission Mott MacDonald (or similar agency) to produce an impact study on the residential population in general and specific groups of residents in particular.**
- 8. That residents of Evelyn Mansions and other potentially significantly-affected dwellings receive a package (including financial) of mitigating measures.**
- 9. LUL reconsider their plans for taxis during and after the construction phase.**

LIST OF REFERENCES AND DOCUMENTS

All documents supplied by LUL in TWAO Application.

Letters of Objection from Westminster City Council, LandSecurities and Network Rail dated January, 2008.

Victoria Area Planning Brief.

LandSecurities Planning Application for the Victoria Transport Interchange (Autumn 2007).

Various GLA Policy documents including 'The London Plan'.

'Transport 2005 – Transport vision for a growing world city' TfL.

Statement of Case from the Cathedral Area Residents' Group (March 2008).

VIG Memorandum and Articles 2007.

VIG April 2008
Final/02/04.08