

CAPITA SYMONDS

DEVELOPMENT TRANSPORT AND INFRASTRUCTURE



Victoria Palace Theatre

**126 Victoria Street,
London, SW1E 5LA**

Proof of Evidence OBJ21/P5

**Proof of Evidence
Victoria Palace Theatre
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1. Introduction and Background

- 1.1 I am Dr Peter Loveday and I am an Associate Director with Capita Symonds in their Holborn office.
- 1.2 I hold a degree in Geography, a Diploma in Civil Engineering and a PhD in Transport. I have over 30 years experience in providing transport, planning and development advice to both the public and private sectors in the UK and overseas.
- 1.3 I have been an Associate Director at Capita Symonds since July 2006 and prior to that I was the Head of Network Assurance at Transport for London (TfL) and responsible for reviewing development applications within 200m of the Transport for London Road Network.
- 1.4 During my period of employment at TfL I was a team member concerned with the development of Victoria Transport Interchange (VTI) and considered the transport movements in and around Victoria. I was also concerned with the transport implications of developments in close proximity to other railway stations, including Canning Town and Colliers Wood.
- 1.5 This proof considers the impact of the Victoria Station Upgrade (VSU) in its current form. I consider transportation impact myself but rely on material from others (as explained below) when considering other effects. I also consider whether other options to the VSU satisfy the original requirements. My client, Victoria Palace Theatre (VPT), have asked me to look at the implications of upgrading the VSU scheme on their operations.
- 1.6 The initial VSU application was submitted by London Underground Limited (LUL) in support of an Application to the Secretary of State for Transport under the Transport and Works Act 1992 for the Victoria Station Upgrade (VSU) scheme. This scheme included a proposal to demolish 120-124 Victoria Street, 3-11 Bressenden Place and Elliot House, all of which are close neighbours of the Victoria Palace Theatre (VPT).

- 1.7 This application was followed by the submission of a Transport Assessment and Environmental Statement, prepared by Mott MacDonald on behalf of London Underground Limited (LUL) in November 2007.
- 1.8 However, on the 12th August 2008, a revised Transport Assessment and Supplementary Environmental Statement (SES) were released, in part as a response to the numerous objections raised by stakeholders to the VSU. These revised documents have provided details of several changes which may be of benefit to VPT, but it should be stressed that the fundamental transport issues that are present in the original VSU plans and supporting TA/ES remain.
- 1.9 Having considered the impact of the proposed VSU scheme and some of the other options which appear possible, I have concluded (as explained in the chapters below) that the impact of the proposed scheme on the VPT is unacceptable, that the traffic and transportation implications of the development have not been fully appreciated, and that there are other options which can reasonably satisfy LUL's objectives without prejudicing the VPT to the extent of the current VSU scheme.
- 1.10 The remainder of my evidence is structured as follows:
- 1.11 Section 2.0 presents the existing conditions at the Victoria Palace Theatre including the Victoria Mainline and Underground Station.
- *Section 3.0 provides a summary of the Victoria Station Upgrade.*
 - *Section 4.0 describes the LUL's proposals.*
 - *Section 5.0 describes the LUL's alternative proposals and the harm that will come to VPT*
 - *Section 6.0 describes the alternatives that are available to the LUL's proposed scheme.*
 - *Section 7.0 questions whether the proposals meet the original objectives.*
 - *Section 8.0 provides a set of conclusions to the proposals by London Underground Limited.*
 - *Section 9.0 provides a summary of the evidence.*

2. Existing Conditions

Victoria Palace Theatre

- 2.1 I have visited the site at Victoria Palace Theatre, 126 Victoria Street, London SW1E 5LA on a number of separate occasions. The theatre is located on the north side of Victoria Street approximately 100 metres from the mainline station. Others have described the theatre and its surroundings in their written evidence so I will concentrate in what follows in terms of the traffic and transportation conditions.
- 2.2 The theatre's main entrance is located on Victoria Street, which forms part of the Victoria Gyratory, a busy road system that separates the theatre from Victoria mainline station. The pedestrian walkway outside the theatre on Victoria Street is wide in order to accommodate the heavy pedestrian usage as a result of retail and commercial trips.
- 2.3 It is important to note that the theatre caters for a broad demographic, including school children, elderly patrons and tourists. Pedestrian access is naturally a very important part of the theatre's day-to-day operations in order to provide a safe and efficient way of providing access and egress to the theatre.
- 2.4 Additional access to the theatre is found in Allington Street, which provides a step-free door for PRM (Persons with Reduced Mobility). This step free access is used to access the back of the stalls where specially designated seats for wheelchair users and their carers have been allocated to ensure an easy operation for these patrons. The stage door of the theatre is also located in Allington Street, which is also used by employees and for bringing props/staging materials into the theatre. The access on Allington Street is also the location of a main fire escape.
- 2.5 The theatre is open for performances in the evenings Monday to Saturday and for afternoon matinees on Thursdays and Saturdays. There are also rehearsals that take place on a regular basis during weekdays when matinees are not being performed.

- 2.6 During the early evening, prior to the start of performances, the full width of the footway on Victoria Street is crowded with patrons of VPT. The kerbside is also used by taxis to drop off customers at the start of performances.
- 2.7 The theatre has a capacity of 1550 seats, with most arrivals occurring 30 minutes prior to the performance starting. The majority of departures from the VPT occur 30 minutes after the performance has ended. In addition to the audience the theatre employees back stage staff and a cast of actors so this can account for another 150 people on site during a performance.
- 2.8 Victoria Palace Theatre (VPT) is currently staging the show Billy Elliot, Monday-Saturday (19:30 start), with matinee performances on Thursday and Saturdays (14:30 start)
- 2.9 The auditorium holds 1550 seats, and being in central London, the accessibility of the theatre is of paramount importance both in terms of regional access and local access. The roads in the area are vital, as visitors to the theatre currently use various forms of vehicular transport, especially buses and taxis.
- 2.10 Taxis dropping off or picking up fares outside the theatre do so by briefly stopping directly in front of the theatre. VPT is located on Victoria Street which is part of the Victoria Gyratory. It includes 2 lanes of westbound traffic and a bus lane directly outside the theatre. The presence of a bus lane gives an indication of the frequency and priority given to bus services passing the site.
- 2.11 There are twelve scheduled bus services passing VPT, the majority of these being high frequency services running until the early hours of the morning. There is also a one way system running clockwise around the block via Allington Street and Bressenden Place with both these roads being part of the scheduled bus services route.
- 2.12 Visitors travelling to and from the VPT as pedestrians, for example from Victoria Station, are currently able to do so without hindrance. Access to the VPT from the terminus is achieved by simply crossing Wilton Road onto the Little Ben Island then crossing Victoria Street. All other major roads within the immediate vicinity have sufficient crossing facilities, allowing pedestrians freedom of movement.

2.13 Victoria Palace Theatre has been part of the Victoria streetscape for a long time and its position and access have been a contributing factor to its success as a long standing theatre venue.

Victoria Palace Theatre expansion

2.14 Victoria Palace Theatre wish to extent the theatre to the north by approximately 6 metres and has submitted an application to Westminster City Council for permission to make significant improvements within the existing theatre, to build a new and extended stagehouse incorporating a six metre strip of land at the rear of the stage, and to provide two passenger lifts adjacent to the front-of-house facilities (also to be extended and improved) at the side of the theatre.

2.15 VPT's objectives from the application are:

1. to maximise the potential of the stage and extend the back-of-house facilities by taking in the additional 6 m of land to the rear of the stage.
2. To improve the comfort of the auditorium by improving the layout and ergonomics of the seating and providing more efficient heating and air conditioning.
3. To maximise the amount of foyer space and front-of-house facilities (including bars and toilets), and improving circulation by the use of new passenger lifts to the Dress and Grand Circle levels.

2.16 The expansion plans by the VPT require the 6 metre strip of land to be made available and this would not be possible with the current VSU plans.

Victoria Underground Station

- 2.17 'Victoria Underground Station is one of the busiest stations on the Victoria Line with 80 million passengers per annum' (VSU TA p.60). According to the VSU TA the station cannot process the current year passenger demand with the forecast demand expected to grow substantially in the next 10 years and beyond. This peak demand is apparent during the weekday morning peak hour 0800 to 0900 when passengers are prohibited from entering the London Underground station by the use of short-term (10-15 minute) gateline closures and stair closures while passengers are cleared from busy platforms.
- 2.18 It would appear that the cause of the gateline closures is the inability of the Victoria Line platforms to clear passengers and there are safety concerns on these platforms with these passenger demands.
- 2.19 A 20% growth in passenger numbers was used as the basis for future growth (VSU TA p.61) which would suggest that the current passenger demands will increase significantly in the future and consequently the demand for platform capacity will have to be satisfied.

Victoria Mainline Station

- 2.20 Victoria Mainline Station is one of the busiest mainline stations in Britain and according to the VSU TA (p.49) it caters for over 350,000 passenger movements per day. As a previous regular user of the station it is apparent that the station is a busy interchange with 19 platforms in regular use by a number of train companies serving the south and south-east.
- 2.21 The installation of ticket barriers at the platforms, along with the distance between those platform ticket barriers and underground and bus stations, has helped to dissipate passenger flows out of the station. The mainline station generates the majority of passengers that either interchange with London Underground services, London buses, Victoria Coach station, taxis or walk trips to nearby employment, retail, leisure and other uses.
- 2.22 Walk trips to VPT are served by the many pedestrian entrances/exits that currently exist on Terminal Place.

2.23 The VSU TA (p.4) mentions the Victoria Station Development proposals which would involve station modernisation and the provision of additional rail passenger facilities. There is also mention in the VSU TA of an additional 75,000 sq.m of development as part of the station redevelopment. The reference indicates there is no known scheme for the redevelopment of Victoria Mainline Station but this would appear difficult to understand why the LUL proposals are moving forward while the modernisation of the mainline station and associated development is not well defined. It would seem logical that any development proposals for the mainline station and its immediate surroundings form part of an overall master plan for the station as a whole.

Summary

2.24 In summary it can be said that the Victoria Palace Theatre is a busy, successful historical theatre ideally located close to one of London's main railway stations. The Victoria area where the theatre is located is one in which development is being contemplated by a number of parties including LUL. Land Securities also has plans for substantial development of the area and will produce their own evidence about this. All this development is to take place in a relatively small space and it is essential that all major parties work together to produce an integrated plan of development for the future.

3. Summary of Victoria Station Upgrade

- 3.1 According to VSU ES (p.1-1) construction of the proposed Victoria Station Upgrade (VSU) will span over a six year period. Its purpose is to cope with the predicted increase in the number of commuters using the station at peak times in the morning, of 20% by 2016, VSU ES (p.1-1). This means that the current figure of 70,000 passengers is likely to rise to 84,000, VSU ES (p.2-9) .
- 3.2 Information on the project was provided through the ES and TA released in November 2007. There has been additional information provided through LUL which included a revised ES (August 2008) and revised TA (August 2008).
- 3.3 Currently, the Victoria Station Complex manages the 70,000 passengers by enforcing gateline restrictions and ticket hall closures on a regular basis which prevents overcrowding on platforms, hence enabling the station to operate more safely.
- 3.4 London Underground's proposal is to develop the Victoria Station Complex and construct another ticket hall - the northern ticket hall (NTH). This will be located below ground adjacent to the Victoria Palace Theatre on the corner of Bressenden Place and Victoria Street. This will also include additional entrances and will be linked to the existing station via underground pedestrian tunnels.
- 3.5 The scheme did not include any attempt to increase the capacity of the Victoria Line platforms it relies solely on the concept of dissipating pedestrians along the existing platforms.
- 3.6 The six years that are required to complete the proposed VSU development will involve major construction activity above and below ground. Demolition work is also planned to take place around the VPT building itself and this includes the demolition of Elliot House, buildings 3-11 along Bressenden Place and 120 and 124 Victoria Street. Also included in the original scheme was the closure and removal of the subway and public lavatories under Bressenden Place.

- 3.7 The land left behind after demolition works was to be included in the VSU plans. London Underground promoted this development as the “Corner Site Development” (CSD) which was to comprise a seven storey building with retail land use (A1) at the ground floor and office (B1) on the remaining floors. This was followed by a planning application which was submitted to the City of Westminster Council.
- 3.8 At the time of writing this Proof of Evidence, the planning application for the CSD site had been withdrawn, and alternative schemes were being put forward by LUL.
- 3.9 These include the landscaping of the demolished Elliot House. However, as aforementioned, the transport issues that are of most importance to VPT are unresolved. The construction traffic and restriction of access continues to be of great concern to the operation of the theatre in transport terms for a long period.

Objectives of the VSU

- 3.10 The Victoria Station Upgrade (VSU) Environmental Statement (ES, November 2007) describes the key principle of the VSU as;
- 3.11 “to increase the capacity of Victoria Underground Station so that it is fit for purpose for handling present and forecast demand, and to minimize passenger journey time and improve the quality of access, interchange and ambience to the maximum extend practicable within physical, schedule and financial constraints.” (ES, 2-2)
- 3.12 The VSU has a number of key objectives that it sets out to achieve. These have been extracted from the VSU ES (p2-2 and 2-3) and summarised below;
- 3.13 **Congestion relief:** Demand for services during AM and PM peaks is very high. Station closures are common every weekday morning, and passengers entering and exiting the station are often completing their journeys in potentially dangerous situations of overcrowding and ‘bunching’ on platforms.
- 3.14 **Increasing passenger capacity:** Demand for services is already at a high level, and this is set to increase significantly over the coming years. By 2016 an expected increase by 20% is expected. The result, if little (or nothing) is done to alleviate the capacity issue, will be
- passenger satisfaction will not improve
 - there will be greater discomfort and frustration for passengers using the service
- 3.15 Following the VSU scheme, using TfL modelling software, the forecasts (including 20% increase in passengers) will mean the station will be of sufficient capacity to cope with passenger throughput until 2055 (ES 2-2).
- 3.16 **Minimise passenger journey time:** At present, passengers using Victoria Station need to leave the station and walk to the closest Victoria Line entrance at Wilton Road. The current facilities within the station are not able to cope with the number of passengers. The existing station entrances themselves were not designed for the current and forecast levels of passenger demand.

- 3.17 **Improve safety:** The ES states that emergency evacuation times need to improve in line with current best practice guidelines. In addition, there is no dedicated fire fighting access. These would be addressed in the VSU.
- 3.18 From the above objectives it is clear that LUL wish to overcome the capacity issues that currently exist and provide a solution that will provide capacity for considerable time to come.

4. LUL's Proposals

The Original Proposal

- 4.1 The original VSU development was made up of the following elements in **bold** extracted from the VSU ES (p1-2). Additional comments are provided underneath each element.

“A new subterranean North Ticket Hall (NTH) at the junction of Bressenden Place and Victoria Street improving access from the north and east of the station”;

- 4.2 This ticket hall is currently located directly adjacent to Victoria Palace Theatre, with large sections of the station and tunnelling underneath the theatre's auditorium.

“An enlarged existing Victoria line ticket hall (known as the South Ticket Hall (STH) providing greater ease of passenger movements inside the station”;

- 4.3 The enlarged STH will be situated south of the VPT, with a network of tunnels linking with the NTH and District and Circle line ticket hall and platforms.

“Three new banks of escalators (each bank comprising three escalators)”;

- 4.4 These three banks of escalators are named on the 3D Cut-away Isometric drawing (viewed from Victoria Mainline Station) as “New South Escalators”, “New Victoria line Upper Escalators” and Victoria line Lower Escalators”. The bank of escalators which are due to cause the greatest negative impact to Victoria Palace Theatre are the Victoria line Lower Escalators, which under current proposals will run in close proximity to the foundations of the theatre. The provision of these escalators running continuously through the day will be likely to impact on the theatre as a result of additional noise and vibration sources. The planned construction works include jet grouting these foundations, which experts anticipate will increase the vibration/noise experienced from within the auditorium.

“A new interchange tunnel, referred to as the Paid Area Link (PAL). This new pedestrian tunnel will connect the NTH to the STH”;

- 4.5 This tunnel shall connect the NTH to the STH, which involves the tunnelling of the PAL, which runs directly beneath the VPT auditorium.

“New lifts providing step free access for persons of reduced mobility (PRM) between the street, ticket hall and platform levels, for the NTH and STH and for interchange between the District & Circle line and Victoria line platforms”;

- 4.6 The new lifts will be located at the Cardinal Place entrance, Bressenden Place entrance, Network Rail Concourse, NTH passageway lift, STH passageway lift, NTH D&C line platform lift, and STH Victoria line lift.

“Improved emergency services access and evacuation core in the NTH”;

- 4.7 A new fire-fighting access tunnel will provide direct access to the Victoria line station platform. This runs adjacent to the Victoria line passenger lift.

- 4.8 ***“Improved access between the National Rail and Underground stations through increased escalator and lift provision”;***

- 4.9 As stated previously, the lift and escalator provision will increase as the STH and NTH are constructed. Whilst the proposed development will improve access, the impact on VPT would be unacceptable. The bank of three escalators leading onto the Victoria line platform would be the most detrimental to the VPT as they will generate additional noise and vibration sources close to the theatre.

Utilities diversions

- 4.10 The proposal description in TA p.75, does not elaborate on this, although one can assume from other sections of the ES and TA that construction works will heavily disrupt current theatre operations, meaning diversions and re-routing of pedestrians, emergency access and deliveries will be necessary.

Demolition of some buildings for the purposes of the works

- 4.11 The demolition proposals include Elliot House which is immediately adjacent to the VPT, 3-11 Bressenden Place and 120-124 Victoria Street. The demolition of the subway and public toilets under Bressenden Place are also in close proximity to the theatre, and will mean all pedestrian access to VPT will be re-routed, crossing the traffic signals at Bressenden Place.
- 4.12 The CSD proposal will involve the building of a new Northern Ticket Hall (NTH). NTH (judging by main proposal plans) shows that the structure will be extended by up to 4 floors sub-surface level. The proposed NTH is currently 63m by 21m, which is a large structure in anybody's terms. At surface level this will provide pedestrian access to the station via two entrances; Victoria Street, and Cardinal Place. Both of these entrances have lifts, which provide PRM the option of descending to the ticket hall step-free. Passengers are then required to pass through the barriers, descending further by using one of three escalators. The tunnel is named as Passageway North, and winds around to eventually link with the District and Circle line. This is known on the plans as D&C line Interchange. Following the new tunnel around to the left, there is a further set of three escalators, leading to the Victoria line platforms.

PRM access

- 4.13 As noted previously, the ticket hall and barriers are located sub-surface, and are served by two lifts (one on the Victoria Street entrance and the other by Cardinal Place). For PRM using the underground, the second lift is located on the other side of the ticket barriers.
- 4.14 This then leads around to the third lift, which takes PRM directly onto the platform. The provision of lifts is good, and those with restricted mobility do not have to navigate complicated tunnelling network.

Emergency Access

- 4.15 Fire-fighting access is available from the street above (Bressenden Place). From here, there is a direct tunnel through to the PRM lift that leads directly onto the Victoria Line platform. This tunnel is necessary for safety, and is not seen as a significant issue for VPT.

Signal Equipment Room

- 4.16 The proposals also contain a new Signal Equipment Room (SER) that is currently located in the area between platforms on the Victoria Line. It is worthy of mention due to its significant size and proximity to the VPT.

Revised Proposal

- 4.17 The revised scheme that was made available on the 12th August 2008, gave no significant mitigation to transport issues that this evidence has described. There are some alterations (such as a reduction in the size of the NTH) and the deletion of the cooling tunnel, which are discussed later in this evidence. It was hoped that as a result of consultation with VPT and its representatives that LUL's revised scheme would contain major changes that remove the concerns of the theatre. However, from the changes made, that was not to be the case. These are relatively minor design changes, and do not alter VPT's objection to the scheme. This section will briefly describe the revised VSU scheme.
- 4.18 The construction shaft in Allington Street has been relocated with a realignment of PAL North #4b. However the demolition works will continue as planned under the proposed scheme. This raises the issue of access once again. The heavy construction related traffic and nearby demolition works will restrict access to the theatre in the form of traffic diversions, closures and potential threats to pedestrian safety. Whilst reassurances have been made in the TA/SES that mitigation procedures will be implemented, it is highly likely that VPT will be adversely affected during this period of demolition.

- 4.19 The revised ES states that due to the changes in the design it was 'considered appropriate to revisit the assessment of alternatives and the process which led to the current design'. However, in general, the changes to the scheme have done very little to address the transport concerns relating to loss of access, construction traffic and general disruption to the Victoria Palace Theatre.
- 4.20 A revised TA has been produced in support of the Revised VSU Scheme and once again there was a distinct lack of consideration for VPT and very little on reducing the impact of the VSU scheme on the theatre.
- 4.21 The Victoria Palace Theatre is mentioned in the Consultation section, which describes representatives of the VPT attending meetings as stakeholders in the scheme. It is also stated that 'Feedback from these meetings has been taken into account when making the recent adjustments to VSU'.
- 4.22 The first reference to changes directly concerning the VPT is in 2.2.9 Deletion of Cooling the Tube tunnel. Here it is noted that the reduction in requirements of this project has allowed Tunnel #20 (directly beneath VPT) to be deleted. This change will reduce the amount of construction but does not relocate the proposals in any way.
- 4.23 The relocation of the construction shaft in Allington Street has been made with a consequential realignment of PAL North 4b. This change was made to reduce the impact of VSU on possible third party redevelopment proposals in the areas. This is not expanded upon.
- 4.24 The applications for planning permission and listed building consent made by LUL to redevelop 120-124 Victoria Street and 3-11 Bressenden Place (located next to VPT). The buildings will still be demolished, but an alternative interim 'landscaping' project will be implemented. This post development action will not benefit VPT and could provide a meeting point for undesirables next to VPT.
- 4.25 2.8.4 states that the Phase 3 assessment for VPT has been completed and sent to English Heritage. It describes mitigation measures which, when implemented, will result in a low risk of damage to the theatre.

- 4.26 The Supplementary Environmental Statement differs from the previous ES, which largely ignored the presence of the VPT. Page 69-70 are dedicated to 'Specific additional mitigation' for VPT, with particular emphasis given to the potential cosmetic damage, especially the plasterwork of the theatre. The issue of noise and vibration (both airborne and groundborne) during construction could be mitigated by a combination of regular liaison between the construction site and VPT.
- 4.27 It is noted in 6.3.37 that the construction techniques to be employed will be more appropriate to the site, with the addition of monitoring equipment to control both vibration and movement.
- 4.28 The VPT is referred to in *Table 6-21: Changes to Significant Residual Effects to those predicted in the ES*, where the VPT is described as having a reduction of significant adverse effects from significant effect to non-significant.
- 4.29 Further to the changes to the scheme, there is a proposed 'beneficial change' in that temporary landscaping of the site adjoining the Victoria Palace Theatre will be in place of the demolished buildings. As mentioned earlier in this evidence, the applications to develop this site have been withdrawn by LUL. The theatre will receive a number of 'visual' upgrades, in the form of green space and cladding to the newly exposed walls of the VPT. It is noted that 'careful design' is stressed. Overall, this is considered to be a "significant enhancement to the setting of the VPT". This is explained more fully on page 131 on the revised SES.
- 4.30 However, as suggested in 4.6, there is the potential for this newly created space to be used by undesirables. VPT has made it clear that its policy is to retain patrons inside the theatre for the duration of the performance.
- 4.31 The revised Transport Assessment contains just two references to the Victoria Palace Theatre. These are observations of walkways, one of the asphalt that is currently laid outside VPT, the second is of the lack of a guard railing on this section of Victoria Street.

4.32 Once again it is clear that VPT has not benefited in any significant way in terms of the revised impacts of the VSU scheme. In the light of the harm which the proposals will cause to the VPT (and which I will deal with next) there is a need to look for alternatives to the VSU scheme as the only means available to reduce impacts on the theatre.

Harm caused by the proposals to the Victoria Palace Theatre

4.33 The proposals, both initial and revised, will raise a number of serious concerns for the VPT as the proposals are in close proximity to the theatre and they can be summarised as follows:

4.34 In order to provide improved access to the station facilities, tunnels and a ticket hall are proposed to be constructed under the VPT and that will put the theatre at risk during construction and subsequent operation as a result of settlement. Evidence on this will be provided by Mr Colin Wilson and reference will also be made to the evidence of Mr Tim Chapman who will give evidence on behalf of Land Securities.

4.35 A set of escalators (the Northern Escalators) are proposed that will generate noise and vibration throughout the day and evenings due to their proximity to the auditorium as well as the use of jet grouting that will help to transmit that noise and vibration. Evidence of this will be given by Mr Richard Greer.

4.36 The construction of the NTH and PAL underneath the theatre could have long term structural implications for the theatre. This is something with which Mr Colin Wilson will deal.

4.37 In order to construct access to the worksite it is proposed to demolish Elliot House and other adjoining buildings which in the case of Elliot House is only 2 metres away from the VPT structure. During the demolition programme intolerable disruption will take place for the theatre.

- 4.38 In order to construct the proposed works there will be a worksite immediately adjacent to the VPT for the length of the construction as well as significant changes to access during the utility diversions. The proposed 7 year construction programme that will see a construction site immediately adjacent to the theatre and tunnelling works taking place beneath the theatre that will mean that the theatre will have to be closed for long periods.
- 4.39 During the utility alterations in Allington Street the theatre's emergency access, service access and PRM access will be interrupted for a period of 9 months. If emergency access cannot be guaranteed then once again the theatre will have to be closed.
- 4.40 The proposed works will prejudice the possibility of the proposals the theatre has for its own expansion plans. The theatre wishes to make upgrades including the provision of lifts for those patrons with mobility difficulties so if these changes cannot be made the theatre will be disadvantaged. Mr John Satow explains this in his evidence.
- 4.41 From the above comments it is clear that the impacts of the proposed changes are significant and cannot be 'compensateable' due to the historical nature of the VPT. The history of theatre will be dealt with by Mr John Earl and the overall assessment of the harm caused to the theatre in its planning and policy context will be dealt with by Mr Jeremy Edge.

4.42 It is clear that the current proposals focus heavily on the area adjacent or beneath the VPT. These proposals are also likely to cause severe disruption to the theatre during the period of construction and in some instances during post-construction. In the remainder of this section I will consider the specific harm caused to the theatre as a result of the traffic implications of LUL's proposals.

Traffic Implications of the LUL proposal on the Victoria Palace Theatre

4.43 The proposed development detailed in Section 6 of the ES (A-16 to A-43), "**Prediction of Impacts and Effects**". In the Transport Assessment, pages 82-140 are referenced for '**Effects**' on a wide variety of stakeholders. It is worth noting at this stage, that Victoria Palace Theatre was not referred to in detail in either publication by TfL, with very little mitigation offered, despite the serious implications of the scheme on the site.

Road Closures and Traffic Diversions

4.44 Land surrounding Victoria Palace Theatre will be a construction site for a (minimum) 5 year period according to the VSU ES (p5-54) potentially between 2009 and 2014. Works include demolition, excavation and construction. These works will have a considerable impact on the usage of the site as an important central London theatre. In terms of road closures and traffic diversions, the immediate area around VPT will be severely affected.

4.45 Throughout the utilities installation period, the following issues are likely to have an adverse impact on accessibility and operations of the VPT:

1. Major restrictions to Bressenden Place
2. Partial closure of Allington Street (various phases) with complications arising over access for PRM, props and general services and emergency vehicles.
3. Victoria Street (outside main entrance) will be subject to extensive road works which will affect the taxi pick up – set-down for patrons of the theatre

- 4.46 It is noted that there are 18 months of utilities diversions and reinforcements in and around the immediate vicinity of the VPT, including disruption to existing service and set-down points.
- 4.47 In addition, major restrictions to the Bressenden Place and Victoria Street junction between March and May 2009 shall result in reduced capacity on this major junction. This in turn will cause significant traffic accumulation in the surrounding area.
- 4.48 The partial closure of Allington Street (see 4.6) between May and September 2009, will restrict traffic severely, particularly to essential services: PRM using taxis, services and emergency access. In addition, the closure of Allington Street during Phases 1,2 and 3 will affect bus routes, as described in Table TX6:9 (Environmental Statement, Technical Appendix A – Traffic and Transport, A-37). It is proposed that the contra-flow bus lane in Victoria Street suggested “will mitigate effects for some routes” (TX6.9), but will change the existing arrangement outside the theatre.
- 4.49 The partial closure of Victoria Street at the frontage of the VPT will be 30 metres in length along the nearside lane to the theatre itself and will disrupt the existing taxi set-down arrangements immediately outside the theatre (described in 2.9). In addition, the worksite on the south side of Victoria Street will have a direct effect on the operation of bus stop G, which will be one of the stops used by patrons of the theatre. This closure is scheduled to take effect between July and September 2009. Suggestions at this stage include relocating to the west of the existing stop.
- 4.50 The modelling assumptions, which are made in 3.2.1 of the revised TA (Highway Modelling Assumptions), assumes the ‘worst case scenario’. It states that in reality, many of the traffic impacts can be altered via trip re-assignment, trip re-timing, modal shift, changing the destination station choice and changing interchange choice. This is assuming that pedestrians in this area are frequent users such as office workers and residents. However, due to patrons of VPT often travelling from outside of London, regionally, nationally and internationally, to assume that visitors will be prepared to re-map an alternative route avoiding the works is both unrealistic and unreasonable.

- 4.51 Similarly, modal shift would be impractical in many cases for VPT patrons. The closures and subsequent diversions are complex, and for this reason patrons should not be expected to make alterations to their journeys. Therefore it would appear that VPT patrons are subjected to the 'worst case scenario' as described in the TA.
- 4.52 From the above, it is apparent that the proposed construction site immediately adjacent to the theatre will cause severe disruption to patrons of the theatre. The high likelihood of patrons not being familiar with the area and therefore being confused and disorientated at VPT, will almost certainly have a negative impact on their overall experience. This is at the expense of VPT, with many potential customers being discouraged by the works.

Construction Traffic

- 4.53 As the VSU TA points out, the construction of the North Ticket Hall (NTH), will generate the majority of the construction movements and account for 50% of total movements. The construction of the two ticket halls will be split between NTH and STH, but the greatest proportion of traffic is likely to be generated by the worksite in Bressenden Place.
- 4.54 Construction traffic generated from the NTH worksite on Bressenden Place is estimated to peak at an average of 29 vehicles per day during month 23 of construction. In addition to this, the PAL (Paid area links) construction traffic is estimated to peak during month 37. Again, the greatest proportion of traffic is likely to be generated by the worksite in close proximity to VPT.
- 4.55 The Revised ES makes no reference to construction traffic affecting VPT directly, even though the main route to several of the works will be via Victoria Street.
- 4.56 Mr Bland's evidence (LUL P7) deals with surface transport matters and in particular with the preferred scheme's construction phases. I provide my preliminary comments on his evidence in Appendix A.

Loss of Access

- 4.57 Pedestrian/accessibility issues have been overlooked in many cases in the Environment Statement. For example: no mitigation has been suggested regarding the closure of Allington Street, which provides access for disabled users (only adapted toilets are situated at this entrance also). Taxis will be unable to drive passengers to the door. In addition, emergency access to the site will be affected. The works in Allington Street will be between May-September 2009, the height of the peak season for theatres. The presence of such works will certainly have a knock-on effect with patronage at VPT.
- 4.58 Following on from the above point regarding pedestrian access, no concession is made or mitigation suggested regarding the half-closure of Allington Street along its eastern side. In addition to the stage door and servicing points, the eastern side of Allington Street accommodates several points of emergency access from the theatre as well as providing wheelchair access into and out of the building.
- 4.59 The half closure of Allington Street along its eastern side would appear to prevent taxi access to necessary points for the set-down of disabled customers and, furthermore, risks impeding emergency vehicles needing to gain access to the theatre. It is also likely to disrupt existing servicing arrangements. (Page 134 Allington Street, Wilton Road, Victoria Street – failure to recognise operations of VPT).
- 4.60 If the above impacts are to be reduced or even minimised then alternative solutions will have to be found.

5. Consideration of alternatives by London Underground Limited

- 5.1 As mentioned previously, Victoria Underground station has suffered severe capacity constraints for a number of years. Victoria is considered a priority station for LU. There were a number of large scale and complex proposals, which included cut-and-cover boxes as well as tunnelling infrastructure. These proposals were considered unaffordable, in context to other LU investment priorities.
- 5.2 The original ES makes reference in Section 4.2, to the alternatives consider to the proposed VSU scheme. Although some detail is provided, the alternative designs and the reasons for rejecting them are not supported by sketches or technical drawings of any kind. Drawings, maps and technical documentation, which could have been used to illustrate the alternative schemes, are not included in the ES or TA.
- 5.3 This effectively blocks the public's attempt at making a judgement of their own, instead relying on vague, generic reasons as to why the scheme was rejected. This places the reader in a situation where they are encouraged to accept the written material in the form of written summaries and bullet points, without the aid of diagrams explaining the rejected scheme. After extensive internet research, it is apparent these explanations are not in the public domain. I believe with such a complicated scheme as proposed by LUL that explanations of key decisions should be provided as this is essential element in the ES process.
- 5.4 Additional plans regarding elevations and 3D 'Cut-away' Isometric drawings are also not included in the submitted TA or ES. These are available via the TfL website, but no references to these are made in the written documentation, which again hinders the reader in fully understanding the broader picture of the scheme. However these diagrams are used in evidence by key witnesses in this inquiry (McKenna Finch et al)
- 5.5 Below is a description of the various proposals rejected, as summarised in the VSU ES (p.4-4).

Alternative 1: upgrade of the entire underground station including the Victoria line and District and Circle line ticket halls. Bolt on to A1 with additional open access below the National Rail station concourse (Alternative 2)

- 5.6 Alternative 1 was considered to have a high cost, and would cause considerable disruption for passengers with station closures during construction. Although this statement was made, no further details are given, despite the current proposal also causing considerable disruption. The works would have had a major impact on operation of Terminus Place bus terminal and the Victoria Station taxi rank. The construction complexity was seen as making construction both difficult and expensive.
- 5.7 Finally, due to the lack of commitment for Crossrail line 2 by the Government, the proposed access to this line originally drawn up in the plans was no longer relevant. However, the latest proposals for VTI (Victoria Transport Interchange) are likely to alter both the existing bus terminus and taxi rank.

Alternative 3: Construction of a new ticket hall on the site of Elliot House in Allington Street.

- 5.8 This alternative would locate the north ticket hall in a less advantageous location away from Victoria Street, resulting in longer passenger journey times. The demolition of Elliot House was not considered necessary. This alternative is immediately adjacent to VPT and would not appear to benefit the various stakeholders in the area, particularly the theatre.

Alternative 4: pedestrian access tunnel from the south side of Victoria Street to the new North Ticket Hall.

- 5.9 This option was rejected due to the difficulty of fitting a new station entrance within the townscape on the south side of Victoria Street without disruption to pedestrians, residents and traffic. The pedestrian tunnel would need to pass over the District and Circle lines and then descend to the level of the new ticket hall. It would be difficult to provide accessibility to those with reduced mobility.

- 5.10 Alternatives 5-7 were rejected based on the objective to achieve greater Victoria line platform capacity. There is no reference in the alternative section of the ES (Section 4-2) of the upgrading of whole area in partnership with the private sector.

- 5.11 The Victoria Transport Interchange (VTI) is a large redevelopment scheme that would provide additional office facilities as well as new pedestrian links. The regeneration of the area would also involve transport upgrades, such as taxi ranks and new queuing facilities.

Alternative 5: Construction of an additional underground train tunnel with new platforms.

- 5.12 This alternative would increase the capital costs of the project considerably. The construction of an additional underground train tunnel would involve a long closure and suspension of train services on the Victoria line. This would cause long-term disruption to the operation of the underground station over a period of several years. The complexity of the construction would also add to costs, potentially taking longer to complete.

Alternative 6: Increase the diameter and therefore capacity of the existing tunnel which would in turn allow the platform width to be increased.

- 5.13 This option would however result in the closure of the Victoria line during construction causing disruption of services over a period of several years. It would not be possible to safely construct the tunnel and platform extensions under the Victoria line escalators. The work could also be very expensive.

- 5.14 ***Alternative 7: extension of the Victoria line platforms further south.***

- 5.15 This option would result in extended closures of the Victoria lines during construction causing disruption to services over a period of several years. The construction works would be very expensive also. A mention of VPT is made in 4-7 (ES), where the overland entrance to the underground station is rejected, based on “excessive passenger flow past front of VPT” – however this is likely to be the case in the current scheme.

- 5.16 From recently released material (SES Tech Append C) it is apparent that previous options that were considered by LUL and their consultants after VPT had contacted LUL would have benefited the theatre and were subsequently discarded.

- 5.17 It does seem unusual that the alternatives that provided additional platform capacity were rejected in favour of schemes that did not when one of the main reasons that the LUL station is often closed during weekday morning peak hours is the lack of platform capacity on the Victoria Line.

Other Options considered by LUL

- 5.18 Land Securities's experts have given evidence criticising the optioneering process in more detail. My evidence, however, focuses specifically on the consideration that which LUL has given to Option 2B/C as part of that process. This is because (as I will explain in the next section) it appears to provide at least a partial solution to the serious harm which the VSU scheme would cause to the VPT if it was to go ahead.
- 5.19 Option 2B/C was one of the original set of LUL proposals and it provided an option whereby the escalators were not so close to the theatre and the PAL was constructed along Victoria Street and both of these elements of the option would have benefited VPT in terms of reducing the long term impacts. There would have been still the construction impacts of the NTH associated with this option but it would leave a more attractive long term legacy for the operation of the theatre than the preferred option.
- 5.20 In what follows I shall also consider the alternative option provided by Land Securities in terms of their Option 1a scheme. This option also provides partial solutions for the harm which the VSU preferred scheme would cause. I believe that Option 2B/C and (latterly the Land Securities's scheme Option 1a) should have been properly considered by LUL.
- 5.21 I shall also consider the question of location of the northern escalators which as originally conceived by LUL (SES Technical appendix C: Option Studies – sub appendix B) did not appear to conflict with the VPT. Indeed as appears below, there are good grounds for believing that the northern escalators can be located in a position which does not cause harm to the VPT. The position of the escalators in LUL's preferred scheme (and indeed the Option 2B/C as considered by LUL and Option 1a considered by Land Securities) does conflict with VPT. It is unclear to me why more detailed consideration in the optioneering process was not given to locating these northern escalators in a position in which they would not cause harm to the VPT.

- 5.22 LUL and their various consultants have developed a series of options over the last two years for improving the Underground station at Victoria. These improvements relate to improved connections to the Victoria Line along with new ticket hall facilities and links between the ticket halls and the Victoria Line and District and Circle lines
- 5.23 In December 2006 Mott MacDonald were appointed by LUL to produce a series of options. In the first group of options A1,A2,A3,A4, A5 and A6 the first three were rejected , A4 was developed further into a new option 1, A5 was rejected and A6 was developed into three new schemes called 2A, 2B/C and 2D (SES p.29). These options were then subsequently assessed against the VSU project objectives.
- 5.24 Option 2B/C was developed as a viable option after January 2007 so it can be concluded that Option 2B/C was plausible and had credibility in terms of meeting the original brief. Later in February 2007 Option 2B/C was rejected against the same seven criteria of journey time, programme, project cost, buildability, operational impacts, stakeholder impacts and impact on utilities. (SES p.37).
- 5.25 In terms of the Victoria Palace Theatre, Option 2B/C as a solution for the development of the VSU is the most attractive. This is because while Option 2B/C keeps the Northern Ticket Hall (NTH) it is located north of the VPT foundations and therefore will not adversely affect the theatre in terms of interference by noise and vibrations after construction. The Paid Area Link (PAL) is located away from the VPT and does not affect the theatre in the same way that occurs with many other options.
- 5.26 The same seven criteria were used to assess each option. The reasoning behind the rejection of Option 2B/C is copied from the VSU SES Tech Appendix C (p.27).
- a) Journey Time (Operational safety and quality)
 - o Increased passenger walk distance.
 - o No link to Interchange concourse (not 'step free').
 - o 2m level change from PAL to top of escalator 10, 11, 12.
 - o Potential impact on fire strategy.
 - b) Programme
 - o Similar to 2A which states Better than A4 (less tunnelling).
 - c) Project cost

- Indicative cost saving - £25M
- d) Buildability (in terms of maintaining site/public safety)
 - Increased construction risk: potential for undermining D&C tunnel due to PAL alignment immediately adjacent (assuming Saudi building removed).
- e) Operational impacts
 - Better than 2A as no break in to existing interchange concourse.
 - Option 2A states potential impact on D&C operation
- f) Stakeholder impacts
 - Construction impacts on Saudi building on south side of Victoria Street (i.e. existing tension pile conflicts with PAL alignment).
 - Potential construction impacts on TW KSPS/WDS surcharge drop shaft
- g) Utilities
 - Increased impact on KSPS.
 - No impact on Allington Street utilities.

5.27 I will consider in the next section whether when viewed against LUL's own criteria LUL was correct in rejecting Option 2B/C, particularly in light of the fact that LUL failed adequately to assess the impact of their chosen scheme upon the structure of a Grade II listed building as described in the evidence of Colin Wilson.

5.28 I would also suggest that when constructing large underground structures in a dense urban environment that the impact of the option on the structure and operation of those buildings effected should have been included in the selection criteria.

6. Alternatives to the London Underground Limited schemes

6.1 From the evidence which others will present and which I set out above it is clear that LUL and their consultants have underestimated the impact of the proposals on VPT. It is difficult to understand why this has occurred as the proposals surround the theatre on a number of sides. It appears, however, that there are at least two options which reduce the impact on the theatre while substantially achieving LUL's objectives.

Option 2B/C

6.2 Option 2B/C was the only scheme that LUL proposed in their set of schemes produced in early 2007 that removed the PAL from under the theatre. This scheme is preferable to the scheme to the scheme promoted by LUL:

- It removes the PAL tunnel from beneath the theatre which will reduce the potential for structural damage and long term settlement. It also means that the theatre would not have to be closed for the period when underground works were being carried beneath the theatre.
- The scheme would not require the utilities in Allington Street to be moved so will not hinder access to the theatre
- Has significant cost savings over the preferred scheme
- Has similar walk distance as the preferred option (Option 2B/C is approximately 4 metres longer than the preferred scheme over a length of approximately 100 metres)

6.3 The benefits identified above are in line with the main criteria for the selection of options by LUL (journey time, programme, project cost, buildability and operational impacts) that Mr Finch describes in his evidence (p.22-23).

- 6.4 Obviously LUL want to promote a system that moves passengers efficiently from one point to another. Most passengers' perception of journey distance, however, is relatively poor and where there are only slight differences between schemes in the distances which passengers need to travel, then these schemes should be treated equally. Further the impact of the scheme on surrounding buildings and land uses should be an important criterion in selecting a project. Looking at Option 2B/C in more detail, the following points should be noted when comparing it with LUL's preferred scheme.
- 6.5 First, the programming for Option 2B/C is likely to at least similar to that of the preferred scheme. Accordingly this provides no reason for selecting the preferred scheme over Option 2B/C.
- 6.6 Secondly, there is a cost saving of £25M in adopting Option 2B/C. Cost saving is a strong consideration in any public infrastructure scheme where public money is involved. Accordingly, this factor indicates that Option 2B/C should be selected over LUL's preferred scheme.
- 6.7 Thirdly, while I note there is 'increased construction risk', I note that Mr Finch's evidence (para 4.8.8 p.23) that the suggested impact on the District and Circle Line tunnel is *not* a 'principal reason' for preferring the preferred scheme over Option 2B/C. The impact on the Saudi Building, however, is noted by Mr. Finch as a principal reason for preferring LUL's preferred scheme (p.23). This building is unlisted. The risks to this building do not appear to be more serious than those to the VPT which appear to have been seriously underestimated by LUL (as indicated in the evidence of Mr Chapman and Mr Wilson). VPT is a Grade II listed building. The evidence of Mr Earl, Mr Satow and Mr Edge will deal with the consequences of the harm to the VPT. These consequences are clearly not present when considering the risks to the Saudi Building. This appears strongly to favour Option 2B/C over LUL's preferred option..
- 6.8 During construction however, Option 2B/C would still cause some disruption to the theatre in terms of noise/vibration but significantly less than the preferred scheme.

- 6.9 LUL have already altered the size of the NTH during the scheme development. There is potential to alter the NTH footprint further. Currently the scheme for the NTH measures approximately 63m by 21m which is a very large area (approximately a quarter the size of a football pitch) and it is considered that it would be possible to make a small reduction of the NTH without penalising this option unduly. If this was possible, the 'reduced' NTH would then not undermine the VPT. If another option is taken forward for development that will not undermine the VPT and therefore minimise the effect it will have on the VPT, it should be strongly considered.
- 6.10 It is suggested that Option 2B/C with a reduced size NTH be considered by LUL as a preferable alternative to the preferred option as it would reduce some of the impacts on the VPT and yet still provide the operational capacity and safety benefits.
- 6.11 If Option 2B/C were adopted as the preferred scheme, there would still be serious harm to the theatre because of the presence of the escalator bank at the north of the theatre. The harm that this bank of escalators will produce is dealt with in the evidence of others (see Richard Greer's evidence section 10).
- 6.12 Earlier in the design process, however, LUL proposed that these same escalators could be located 5 metres further north than the current location (SES Technical Appendix C) Whilst this would require moving the current Signal Equipment Room (SER), the VSU proposals contain proposals for a new SER. Accordingly, at present it is not clear why LUL cannot adopt a scheme that contains this configuration for the northern escalator bank. Further Mr Speirs will also present evidence on the number of the escalators to demonstrate that a two bank system would cope with the predicted demand which might help in re-locating them away from a position that currently conflicts with VPT.

- 6.13 If the three bank escalators were replaced with a two bank system, then there would be potential for moving the escalator northwards by 5-6 metres which is the distance required to improve/reduce acoustic and vibration impacts on the theatre and allow the theatre's plan for a small extension to take place. The consequences of using a two bank escalator system as part of Option 2B/C are considered by Mr Speirs. His analysis indicates the extent to which the reduced escalator bank relocated further north would still provide relief for problems which LUL is trying to solve is valid.
- 6.14 I would note that designing infrastructure that does not cater for the absolute peak demand is not unusual. This often occurs for reasons of cost savings, so as not to "over-engineer" solutions, or in order to reduce potential impacts. Indeed, Mr Mckenna's evidence for LUL (Figures 10a to f and Figures 11a to f) acknowledges that significant delays are projected for parts of LUL's own preferred scheme. Having regard to this and weighing the harm which LUL's preferred scheme would cause to the fabric and operation of the listed VPT, it is my view that the reduction of the escalator bank to a two bank system would be acceptable.

Land Securities Option 1a

- 6.15 Land Securities (LS) is a major stakeholder in the upgrade of the area around Victoria Station and especially to the area west of VPT. It is the developer of the Victoria Transport Interchange (VTI) scheme and that was mentioned in VSU TA (p.6). LS's VTI scheme is likely to be a key element of improving Victoria. Their scheme is evolving and needs to integrate with VSU and other related proposals.
- 6.16 The overall LS scheme will be developed in the block to the west of the VPT so it is in their interest to remove some of the utility alterations and remove parts of the scheme from that area so that LS can develop the area in the short to medium term.

- 6.17 The VSU TA (p.6) states that ‘the VSU scheme would provide the capacity for the additional passenger journeys that the VTI will generate therefore the implementation of the VTI (scheme) is dependant on the VSU scheme being completed.’ It can be understood that an additional objective for the VSU is to provide the capacity to allow the VTI scheme to proceed. This would mean that without the VSU there would not be the capacity to accommodate the proposed VTI commercial development.
- 6.18 In recent weeks Land Securities consultant, Steer Davies Gleave have produced an alternative scheme to the LUL preferred option that is referred to as Option 1a. This scheme provides a PAL, NTH and links to the Victoria Line Interchange area.
- 6.19 This particular scheme would appear to have similar walk distances to the preferred scheme, not require large areas of jet grouting and not have any significant utility alterations in Allington Street. In these respects it reduces the harm to VPT when compared with the LUL preferred scheme. On that basis it is to be preferred.
- 6.20 This scheme as drafted shows the northern escalator bank in conflict with the VPT. On the other hand, this harm would on the face of things be overcome if the northern escalators were moved further north as I have described above for Option 2B/C.
- 6.21 Once again this scheme appears to meet Mr Finch’s key selection criteria (p.22-23) (journey time, programme, project cost, buildability and operational impacts) and for those reasons and the potential reduction in impact on both VPT and LS sites this option should be considered further as an alternative for consideration.
- 6.22 If the LS’s Option 1a is set against LUL’s key selection criteria (see Mr Finch’s evidence p.22-23) the following summary can be drawn.
- 6.23 Firstly, the journey times for the two schemes are likely to be similar as the journey distances are similar so there is no reason for rejecting this option.
- 6.24 Secondly, the programming of the scheme over a 7 year period and Option 1a should be possible within this timeframe and provide no reason for rejecting this scheme.

- 6.25 Thirdly, the PAL on Option 1a could be constructed using a Tunnel Boring Machine which would meet the buildability criteria improve the safety of the VPT structure and potentially reduce the cost of the scheme when compared with the LUL preferred scheme. The above reasons favour the Option 1a and I understand that LS will be submitting this option in their evidence.
- 6.26 The position of the escalators in the LS Option 1a as presented still causes the problems for the VPT as described in evidence of Richard Greer Jon Satow and Colin Wilson. As I have indicated above (in relation to Option 2B/C), however, it appears feasible to move the northern escalators further north than their current position so that they do not cause harm to the VPT.
- 6.27 If these changes can be accommodated then Option 1a will be a more attractive option for VPT than LUL's preferred option.

7. Do proposals meet objectives?

- 7.1 I have described Option 2B/C above. That scheme provides a most realistic alternative both in terms of reduced impact on VPT but also has a distinct advantage of the preferred scheme in terms of cost. Obviously Option 2B/C was not the selected solution, but only incurs an imperceptible increase in journey distance (4metres) for trips within the Victoria Underground station. It is suggested in the appraisal of options that this option could cause problems to the Saudi building but nowhere to the same extent that the preferred scheme impacts on VPT. If a reduced size NTH is considered along with a double escalator system on Option 2B/C then the impact on VPT would be significantly reduced.
- 7.2 I believe that Option 2B/C with the suggested reduced NTH should be assessed further as an alternative to the preferred scheme in the light of the impacts on VPT.
- 7.3 The LS Option 1a is another that has been developed recently that has distinct advantages over the LUL preferred scheme. This scheme also meets the principle objectives set out by LUL and has the potential to allow both VPT and LS to operate their sites without undue hindrance in the future.
- 7.4 As far as VPT is concerned either of these schemes requires the relocation of the proposed northern escalator bank to prevent the harm described in the evidence of Mr Satow, Mr Wilson and Mr Greer.

8. Conclusions

- 8.1 The above evidence shows that the LUL preferred option as set out in the ES and Revised ES produces significant impact on the operation of the VPT during the construction and subsequent operation of this fine old theatre which has been part of Victoria for nearly 100 years.
- 8.2 LUL has seemed to ignore the concerns of the VPT over the period when proposals were being developed and yet continued to progress schemes that had tunnels placed beneath the theatre that would result in potential damage as well as noise and vibration impacts.
- 8.3 The construction of the LUL scheme would surround the theatre with worksites for nearly 7 years which will impact on the viability of the theatre.
- 8.4 The construction of the proposed NTH and the PAL will be constructed under VPT and presumably when this work is taking place the theatre will have to be closed which will in turn impact on the long term financial viability of the theatre
- 8.5 The LUL scheme will require the re-routing of utilities services in Allington Street and that exercise alone will mean the service entrance of the theatre will affect the servicing access and emergency access to the theatre.
- 8.6 From these comments it is not surprising that VPT is taking this stance against the LUL's current proposals and is adamant that there must be better solutions to the needs of the travelling public than to threaten the viability of a local landmark and part of London's theatreland.
- 8.7 It is important that at this stage of the development of a major London Underground scheme that the needs of a listed building be considered in detail and amendments to the scheme are made so that the impacts to VPT are reduced.
- 8.8 There have been alternative schemes to LUL's preferred scheme that do not impact on the VPT and the adjacent site held by Land Securities and I suggest that LUL look again at the options and consider the needs of VPT in their revisions.

9. Summary

- 9.1 In summary, it is clear that the traffic and transport operations of the proposed preferred VSU scheme (existing and revised) will have a significant impact on the Victoria Palace Theatre both during the 7 year construction phase and subsequent operation.
- 9.2 The VPT is a busy London Theatre which operates from a Grade II listed building on the north side of Victoria Street approximately 100 metres from Victoria Main Line Station. The theatre with 1550 seats and during the matinee and evening performance can have 150 actors on site in addition to the patrons. The theatre enjoys access from both Victoria Street and Allington Street. In addition to the matinees and evening performances there are regular rehearsals at the theatre. The significance of the Allington Street access points is that they provide emergency access, PRM access and servicing for stage materials.
- 9.3 Although the theatre has been in existence for nearly 100 years there are plans to provide an expansion to the theatre at the northern part of the existing building.
- 9.4 Victoria is subject to development by a number of different agencies including Victoria Main Line Station (yet to be defined), LUL (part of this current TWO application) and Land Securities (planning application submitted).
- 9.5 Victoria Station is one of the country's main stations with large numbers of interchanging passengers as well as people attracted to local Victoria destinations. Under the current situation the gates to the London Underground station are often closed for short periods on weekday morning as there is congestion on the Victoria Line platforms. The current proposal for upgrading the Underground Station will cause significant impact to VPT in both the 7 year construction phase as well as the subsequent operational phase which is expected to commence in 2016.
- 9.6 The impacts of the proposal on the VPT can be summarised as follows:
- The proposed NTH and PAL are to be constructed underneath VPT with resulting settlement, noise and vibration impacts.

- The set of escalators proposed to direct passengers to the northern end of the Victoria Line will have noise and vibration impacts on the theatre but could be moved further to the north to reduce this impact. These same escalators will also prohibit VPT's own proposal to extend the theatre by 6 metres.
- The demolition of the adjacent Elliot House and buildings in Victoria Street will have impacts on the theatre. It is unlikely that the theatre will be able to operate will these buildings are being removed.
- The main construction site in Bressenden Place will have noise impacts on the VPT as it will be operating at the same time as performances at the theatre.
- The proposed jet grouting worksite in Allington Street is proposed for the eastern side of the street immediately outside the emergency access for the VPT and this arrangement is proposed for at least 9 months.
- There will be another worksite in Victoria Street very close to the theatre that will restrict pedestrian flow outside the theatre.

9.7 As a result of these impacts VPT are keen to explore alternative schemes that provide similar facilities for passengers yet do not have the same level of impact as the LUL current proposal.

9.8 There have been alternative proposals by LUL (namely Option 2B/C) and recently the proposal by Land Securities (Option 1a) that have reduced impact on VPT. I understand that VPT would be willing to support these schemes providing that both schemes used a northern escalator that moved further away from the theatre's auditorium to reduce noise and vibration. There is the need to move the escalators approximately 6 metres northwards in line with previous LUL escalator proposals to allow the proposed changes to the theatre's auditorium to take place. This minor change would make these schemes more acceptable to VPT. If the alterations to the escalators could not be made then neither of these alternative schemes would be attractive to VPT.

- 9.9 The time frame for the proposed work is also of concern, with a sustained period of 6 – 7 years, in which the operations of the theatre will be affected and closures of theatre required. As noted earlier, the major disruptions and significant construction phases have been scheduled for May – September. This is the peak time of year for theatre users, and the potential for damage to user satisfaction / financial matters is high.
- 9.10 By nature of the business, the day-to-day operation, the enjoyment of a theatre free from necessary disruption and the financial viability of a theatre rely on its patrons and their efforts to make the journey into a busy area of London. In short, a theatre that is subject to highly frequent construction traffic, restricted front and side street access for vehicles, restricted pedestrian access for disabled users of the theatre, as well as a reduced ambience means that I cannot endorse the Victoria Station Upgrade in its present form and would be looking for alternative schemes to be pursued.

Appendix A

Mr Bland's Evidence

Mr Bland's evidence (LUL.P7) deals with surface transport matters and in particular with the preferred scheme's construction phases. His evidence (p.7) suggests that 'there would inevitably be effects on surface vehicular and pedestrian movements during the construction period' This initial part of the evidence indicates that there will be significant impacts on vehicular and pedestrian movement in the Victoria area during the construction period.

Mr Bland also acknowledges the Victoria Area Planning Brief prepared by City of Westminster which states that 'Proposed developments must take account of, and as far as possible address the transport requirements at Victoria' This document is advising development groups that they must consider the needs of others when developing schemes in the area.

Mr Bland also acknowledges (p.16) that 'the utility works associated with the construction of the VSU are extensive and will have an effect on all forms of surface transport including pedestrians. Mr Bland is warning us that the VSU scheme will have a significant impact on vehicle and pedestrian activity in the Victoria area.

Mr Bland indicates (p.20) that 'the establishment of worksites on the surface , including those adjacent to the existing Victoria Station and along the southern part of Bressenden Place (next to the VPT) will affect all road users including pedestrians , buses, taxis, cyclists and general traffic.' This statement starts to identify some of the sources of transport impact and specifically the Bressenden Place worksite which abuts the VPT.

Mr Bland indicates (p.23) 'the criteria used to predict and evaluate construction effects and appraise potential mitigation measures are effects on road users, effects on pedestrians and cyclists as well as severance.' This statement suggests that where severance occurs there should be mitigation measures.

Mr Bland states (p.38) that ‘the vast majority of premises have to receive deliveries from the highway.....including the Apollo and Victoria Palace theatre’. This statement acknowledges the difficulty local businesses have with deliveries.

Mr Bland states (p.40) that ‘the construction programme is necessarily protracted and is currently anticipated to take about 7 years to complete with the first year primarily focused on utility relocation’ He goes on to identify one of the two main worksites as the southern part of Bressenden Place (next to VPT). This part of his evidence puts an up to date estimate of the construction period of 7 years and identifies the major worksite for the project as Bressenden Place.

Mr Bland highlights (p.49) the impact on Allington Street and states that ‘the eastern arm of Allington Street (outside the VPT emergency access and PRM access) will not be available to pedestrians or PRM for a period potentially in excess of 9 months’ and concludes that ‘the residual effect of the closure will be nominal’ From these remarks it is stated the area immediately outside the theatre’s PRM access and emergency access will be closed so it is assumed that the theatre will have to close as you cannot have a public venue that does not emergency and PRM access and egress. It is possible to imagine in an emergency 1550 patrons and 150 staff and actors trying to access a mustering point while a worksite is immediately outside the emergency doors. I don’t think that this can be viewed as nominal.

Mr Bland states (p.52) that ‘In addition to the main worksite (Bressenden Place) it is proposed that areas of the footway and carriageway of Victoria Street outside the Duke of York Public House extending to the Little Ben pedestrian island (very close to the VPT). During this work the existing pedestrian crossing facilities will be maintained but there will be reduced footway space on the main footways and on Little Ben island.’ This statement indicates that there will be another worksite immediately adjacent to the main entrance to the theatre reducing the footpath width and reducing the width of carriageway.

Mr Bland’s evidence focuses again on Allington Street (p.59) indicating that the worksite in that street will extend across the road ‘necessitating a closure to all vehicular traffic.’ This statement reiterates the restrictions that are likely in Allington Street as a result of the construction works.

Mr Bland states on p.68 that the jet grouting work will last for seven months with half the road width available for passing traffic and remaining parts available for servicing traffic for VPT. It is not clear how this statement can be read in relationship to the earlier statement on p.59 which mentions the closure of the road.

Mr Bland deals with some of the comments made by VPT in the statement of case namely impact of the scheme on emergency services, delivery vehicles and disabled access. Mr Bland suggests that TfL Network assurance and TfL Buses has given approval and support for the proposals and that assists in confirming that emergency vehicles will also be able to access all areas. This explanation does not have sufficient detail to satisfy the concerns of VPT especially when other parts of the evidence suggest worksites in Allington Street and closures of this same street.

Mr Bland also provides figures to support his written evidence and Appendix B2 (part 2) shows the worksite in Allington Street immediately adjacent to the emergency access to VPT. Figure RB11.5 indicates the main vehicular access to the main worksite will be off Allington Street, immediately north of VPT. This sketch shows the proximity of the worksites and indicates the level of impact that the worksites will have on the VPT.